IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

SITEPRO, INC.,

Plaintiff,

v.

TANKLOGIX, LLC

Defendants.

C.A. No. 6:24-CV-00643

JURY TRIAL DEMANDED

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff SitePro, Inc. ("SitePro") files this Original Complaint for patent infringement against Defendant TankLogix, LLC ("TankLogix" or "Defendant") respectfully alleging as follows:

RELATEDNESS TO OTHER CASES

1. This action is related to other actions considered by the District Court for the Western District of Texas, Waco Division, under Judge Alan D Albright. Specifically, SitePro asserted U.S. Patent Nos. 9,342,078 (the "'078 Patent"); 10,488,871 (the "'871 Patent"); and 11,294,403 (the "'403 Patent") in *SitePro, Inc. v. WaterBridge Resources, LLC et al.*, Case No. 6:23-cv-00115-ADA-DTG, another action that it had previously filed in the Waco Division, and in which the Waco Division Court had construed claims of those patents. The Waco Division Court had also considered numerous motions, including discovery motions and dispositive motions, and had resolved disputes relating to the technology at issue in these patents. In addition, U.S. Patent No. 12,019,461 (the "'461 Patent") is related to the '078, '871, and '403 Patents in that the '461 Patent is a continuation of application No. 17/681,373, now U.S. Patent No 11,726,504, which is a continuation of application No. 17/513,539, now the '403 Patent, which is a continuation

of application No. 16/656,319, now U.S. Patent No. 11,175,680, which is a continuation of application No. 15/867,077, now the '871 Patent, which is a continuation of application No. 14/984,422, now U.S. Patent No. 9,898,014, which is a continuation of application No. 14/147,190, now the '078 Patent.

THE PARTIES

2. Plaintiff SitePro, Inc. is a Delaware corporation having its principal place of business at 9502 US-87, Lubbock, TX 79423. SitePro has an additional place of business located at 1523 E. Sonterra Blvd., San Antonio, TX 78258.

3. Defendant TankLogix, LLC is a Utah limited liability company with a registered principal place of business at 1082 West 1700 North, Logan, UT 84321. TankLogix also maintains a regular and established place of business at 12200 W. Highway 80E, Odessa, TX 79765-9610. TankLogix may be served through its registered agent, Gary Wilson, 12200 W. Highway 80E, Odessa, TX 79765-9610.

4. A substantial part of the events giving rise to SitePro's causes of action as alleged herein occurred in the Western District of Texas and have a direct effect on SitePro in the Western District of Texas.

JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*, including 35 U.S.C. § 271.

6. As discussed in greater detail below, TankLogix has committed acts of patent infringement and/or has induced and/or contributed to acts of patent infringement by others in this judicial district, the State of Texas, and elsewhere in the United States, and continues to do so

willfully and without authorization by making, using offering for sale, selling, or importing various products or services that infringe SitePro's Asserted Patents (defined below).

7. This Court has personal jurisdiction over TankLogix because TankLogix has minimum contacts within the State of Texas; TankLogix has purposefully availed itself of the privileges of conducting business in the State of Texas; Defendant regularly conducts business within the State of Texas; and SitePro's causes of action arise directly from TankLogix's business contacts and other activities in the State of Texas, including by virtue of TankLogix's infringement in the State of Texas. Indeed, TankLogix has advertised, promoted, offered for sale, sold and/or distributed and continue to advertise, promote, offer for sale, sell, and/or distribute infringing products to customers and potential customers in this judicial district. SitePro, its customers, and its potential customers reside in the State of Texas, including in this judicial district and therefore TankLogix's acts giving rise to this lawsuit and the harm SitePro has suffered have both occurred in this judicial district.

8. Venue is appropriate in this judicial district under 28 U.S.C. § 1400(b) because TankLogix has committed acts of infringement in and/or has induced and/or contributed to acts of infringement by others in this District, and maintains a regular and established place of business in, this District as set forth above, including at least at TankLogix's Odessa office at 12200 W. Highway 80E, Odessa, TX 79765-9610.

BACKGROUND

9. For more than a decade, SitePro has been at the forefront of data analytics, monitoring, and control of fluids in the energy (SWD and Oil & Gas), municipal, and agriculture industries. SitePro initially sought to enable the digital oil field. From there, it evolved its technology for use in the municipal and agriculture industries. SitePro focuses on developing market-leading software and hardware products that deliver easy-to-use, scalable fluid analytics,

monitoring, and control. SitePro has developed and continues to develop state-of-the-art, award-winning software products, hardware, and equipment. SitePro combines an integrated, best-in-class cloud-based software as a service (SaaS) and mobile application. Both SitePro's software and hardware products and cloud services are vital to SitePro and its customers' businesses.

10. SitePro began as AmpliSine Labs, LLC, which was founded in November 2009. The company was founded to focus on reimagining control and management systems in the underserved SWD market, which in 2011 was a process-intensive business with limited viable software options outside of expensive traditional SCADA systems. AmpliSine Labs changed its name to SitePro, LLC (Texas entity) in July 2018 and then ultimately to SitePro, Inc. effective January 1, 2019.

11. In the early days of the company, SitePro first explored using existing SCADA systems but quickly determined that the then state-of-the-art SCADA systems were inadequate for the SWD industry and the problems facing their potential SWD customers. So SitePro's early executive team, Aaron Phillips and David Bateman, developed their own proprietary system from scratch.

12. Traditional oil field control systems had an automation system that was installed onsite to control the equipment on that site, including pumps, valves, actuators, etc., while also gathering data from sensors within the system or input from individuals at the site. Then, a separate system would allow for access to that data from a web-based platform.

13. SitePro's system was (and is) unique and went well beyond these traditional systems in developing proprietary technology that combined the onsite automation system with the web-based control platform in one application. SitePro became the missing link in oilfield digital fluid logistics. For example, SitePro's proprietary system features a "no-code"

configuration module, advanced ticketing capabilities, and real-time integrated mapping and visualization never previously offered or envisioned by traditional SCADA systems. SitePro later departed from the physical server setup used by traditional systems at the time, and instead built its new platform on Microsoft's Azure cloud.

SitePro's proprietary system monitors tank levels, volumes, pressures, flow rates, and many other data points in real-time. It allows organizations to control pumps and valves right from a smartphone or a computer. SitePro's system is robust and comprehensive, covering real-time data analytics, truck ticketing transactions, and remote management of multiple sites (like an SWD facility) remotely from an office in a large city. SitePro's system also offered scalability well-beyond traditional SCADA systems by pre-programing and creating new parameters for certain nodes and equipment commonly found in a SWD system so that customers (regardless of technical aptitude/familiarity) could quickly and safely add, remove, edit, and control equipment, such as actuators, pumps, valves, and sensors. SitePro additionally developed a mobile application so that its customers could access data, collect data, and control equipment from their mobile devices. In fact, SitePro's proprietary system enabled a sensor reading to be delivered to a user's browser or mobile application less than one second after it was taken in the field.

14. SitePro was also awarded multiple United States patents for its inventions in many technical areas including edge computing, protocol translation (e.g., in which a remote server speaks a single universal language to monitor and control systems in the field, and local "site master controllers" translate those commands in the universal language to device-specific protocols, like Modbus, USB, etc.), and multi-tenant SaaS systems for monitoring and controlling fluid-handling equipment.

15. SitePro owns the entire right, title, and interest in and to each of the following patents, including the right to seek damages for past and ongoing infringement: 9,342,078 (the "'078 Patent"); 10,488,871 (the "'871 Patent"); and 11,294,403 (the "'403 Patent"); and 12,019,461 (the "'461 Patent") (collectively, the "Asserted Patents"). SitePro also owns many other patents and patent applications that are not asserted in this case at this time.

16. The '078 Patent issued on May 17, 2016. A true and correct copy of this patent is attached hereto as Exhibit 1.

17. The '871 Patent issued on November 26, 2019. A true and correct copy of this patent is attached hereto as Exhibit 2.

18. The '403 Patent issued on April 5, 2022. A true and correct copy of this patent is attached hereto as Exhibit 3.

19. The '461 Patent issued on June 25, 2024. A true and correct copy of this patent is attached hereto as Exhibit 4.

20. The named inventor of each of the SitePro Patents is Aaron Phillips. The title of each of the SitePro Patents is "Remote control of fluid-handling devices."

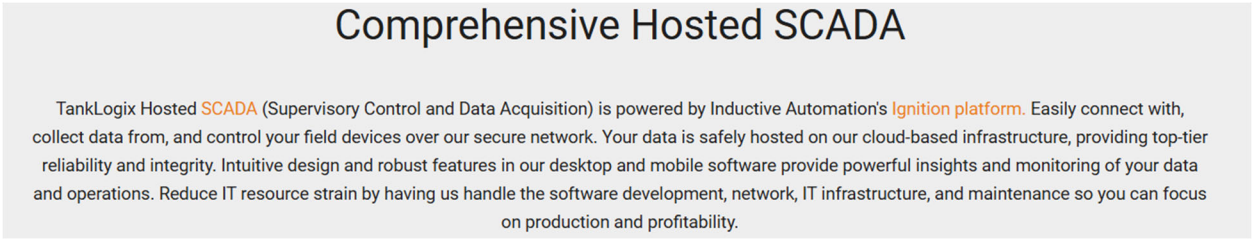
21. Aaron Phillips invented and had a complete conception of the subject matter covered by the aforementioned patents at least as early as January 2012. The date of invention for

these patents is supported by significant evidence (e.g., original inventor notes; early versions of code; customer invoices).

22. SitePro has complied with the marking requirements of 35 U.S.C. § 287 at least because its patents are displayed publicly on SitePro's website—https://www.sitepro.com/legal/patent-information—as well as SitePro's customer login portal—https://auth.sitepro.com/Account/Login, and because 35 U.S.C. § 287 does not preclude the recovery of pre-suit damages at least because there are no unmarked patented articles subject to a duty to mark, e.g., for Asserted Patents in which only method claims are asserted.

23. On TankLogix's website, TankLogix advertises that it provides "innovative, robust automation for the oil and gas industries." *See* https://www.tanklogix.com/about/. TankLogix's website offers a variety of services, including "Oilfield Automation," "Instrumentation & Electrical," "Hosted Ignition," "Remote Monitoring," "Motors and VFDs," and "Site Safety Systems." Upon information and belief, these services are each available to TankLogix's clients and customers through TankLogix's Ignition-Hosted Automation System ("the Accused System"). *Id.*

24. TankLogix indicates that it offers "Comprehensive Hosted SCADA" services as part of the Accused System. *See* https://www.tanklogix.com/hosted-ignition/. TankLogix further states that it is an "Ignition Registered Integrator." *Id.*



COUNT I

TankLogix's Infringement of the U.S. Patent Nos. 9,342,078

25. SitePro repeats and realleges, as if fully set forth herein, the allegations set forth in the foregoing paragraphs of this Complaint.

26. TankLogix directly infringed and continues to directly infringe, under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, at least claims 1-9, 11-13, and 15-19 of the '078 Patent by manufacturing, using, selling, offering to sell, and/or importing into the United States the Accused System.

27. TankLogix has been and is indirectly infringing the '078 Patent by actively inducing or contributing to the direct infringement by others of the '078 Patent in the United States, the State of Texas, and this District.

28. TankLogix also has been and is now knowingly and intentionally inducing infringement of at least claims 1-9, 11-13, and 15-19 of the '078 Patent in violation of 35 U.S.C. § 271(b). TankLogix has had knowledge of the '078 Patent and the infringing nature of the Accused System and other similar systems since at least the filing and service of this Complaint.

29. TankLogix specifically intended and was aware that the ordinary and customary use of the Accused System and other similar systems would infringe the '078 Patent.

30. TankLogix further took active steps to encourage end users to use and operate the Accused System and other similar systems, despite knowing of the ’078 Patent, in a manner they knew to directly infringe at least claims 1-9, 11-13, and 15-19 of the ’078 Patent. Further, TankLogix provided product manuals and other technical information that cause their subscribers, customers, and other third parties to use and to operate the Accused System and other systems for their ordinary and customary use, such that TankLogix’s customers and other third parties have directly infringed the ’078 Patent, through the normal and customary use of the Accused System and other similar systems.

31. TankLogix also has been and are now in violation of 35 U.S.C. § 271(c) by contributing to infringement of at least claims 1-9, 11-13, and 15-19 of the ’078 Patent, literally and/or under the doctrine of equivalents, by, among other things, selling, offering for sale, and/or importing within this judicial district and elsewhere in the United States, the Accused System and other similar systems with knowledge of the ’078 Patent and knowing that the Accused System and other similar systems are especially made or especially adapted for use in the infringement of the ’078 Patent, and is not a staple article or commodity of commerce suitable for substantial noninfringing use.

32. TankLogix’s infringement (both direct and indirect) of the ’078 Patent has been, and continues to be, with full knowledge of the ’078 Patent, since at least as early as the filing of this lawsuit, or as early as TankLogix employees have accessed the patent information on SitePro’s website.

33. For example, Claim 1 of the ’078 Patent recites:

A method, comprising:

receiving, via a network interface, a plurality of user-directed instructions to control fluid-handling devices that monitor or control one or more fluids at an oil well, a

petro water disposal or re-injection facility, or a petroleum pumping station, the plurality of instructions being received encoded in a shared protocol;

obtaining a target state of at least one of the fluid-handling devices based on at least some of the plurality of instructions, wherein obtaining a target state of at least one of the fluid-handling devices based on at least some of the plurality of instructions comprises:

after receiving the instructions, determining a plurality of different target states of the at least one of the fluid-handling devices, the plurality of different states each corresponding to different times;

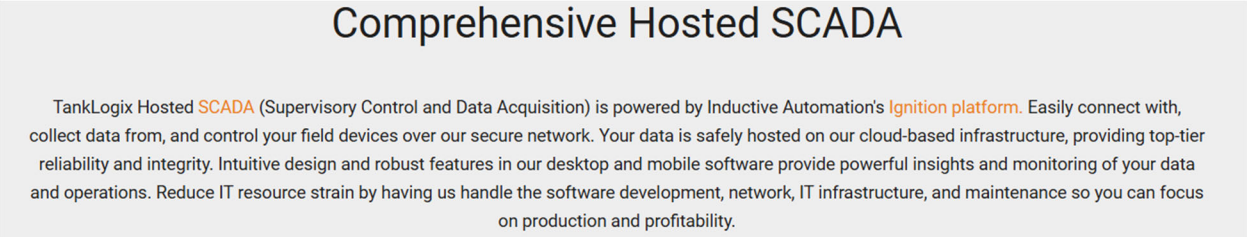
for each of the plurality of instructions, selecting a respective protocol or protocols from among a plurality of protocols different from the shared protocol, wherein the respective fluid-handling device or devices to which the respective instruction is directed are responsive to the selected respective protocol or protocols, wherein at least some of the selected protocols are different from one another;

after determining the plurality of different target states, translating each received instructions into one or more translated instructions encoded in the selected respective protocol or protocols, the one or more translated instructions including the determined plurality of different target states; and

sending each translated instructions to at least the fluid-handling device to which the respective translated instruction is directed, wherein at least some of the translated instructions are effective to cause the at least one of the fluid-handling devices to attempt to achieve the target state.

34. By way of example, the Accused System meets every element of Claim 1.

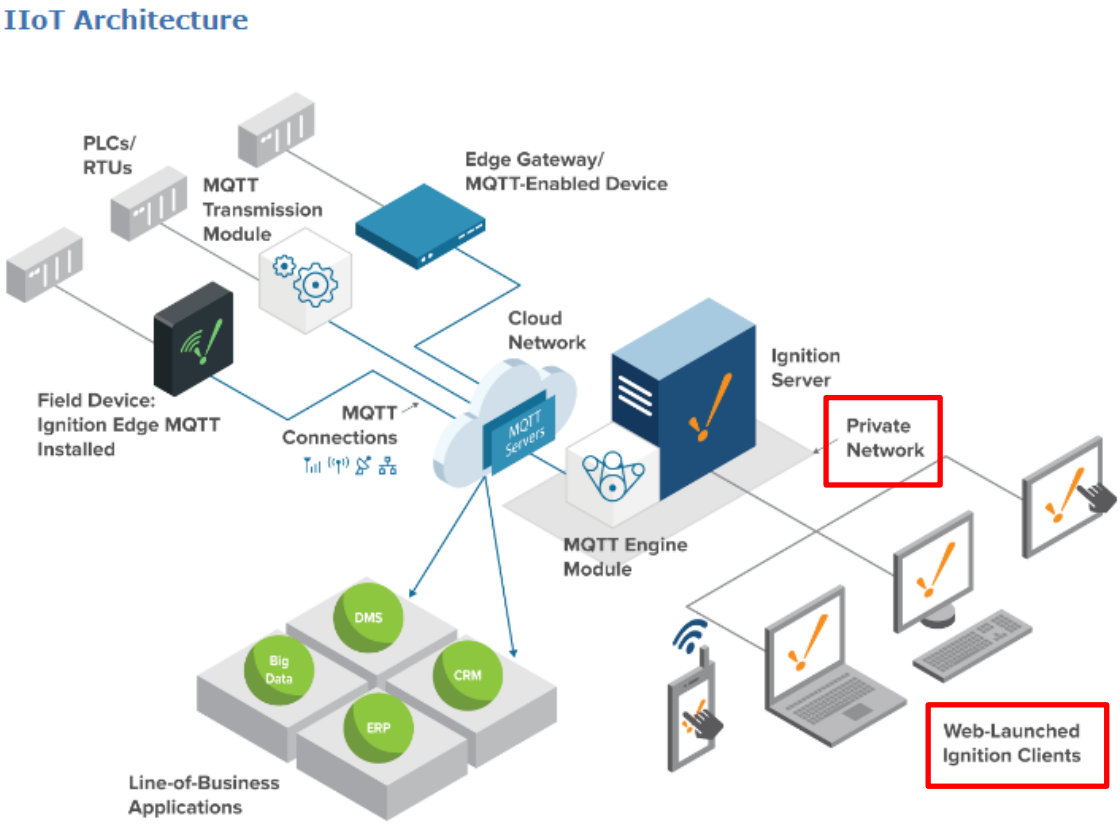
35. To the extent the preamble is found limiting, the Accused System performs a method as claimed:



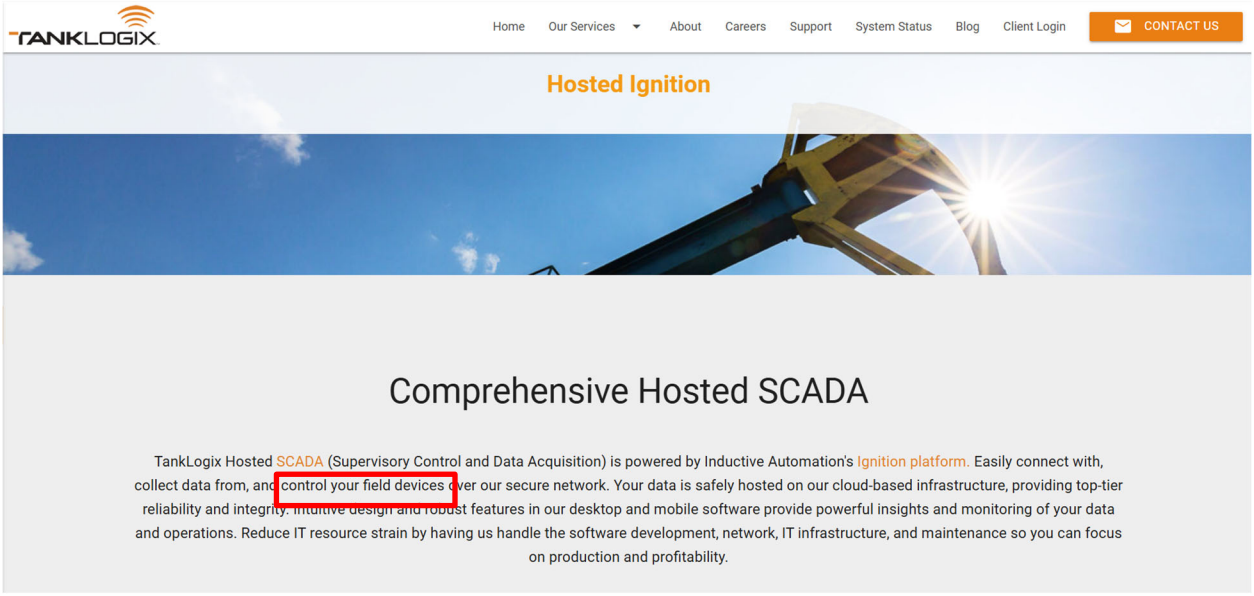
https://www.tanklogix.com/hosted-ignition/.

36. As shown in the example below, the Accused System further comprises receiving, via a network interface, a plurality of user-directed instructions to control fluid-handling devices

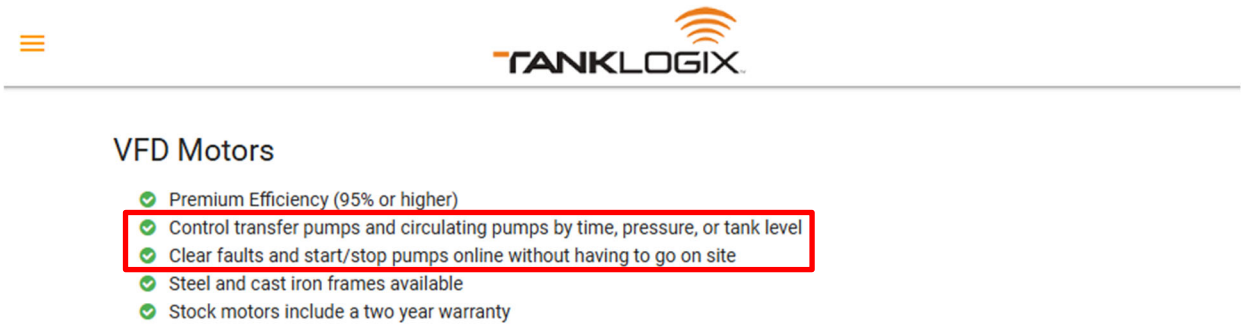
that monitor or control one or more fluids at an oil well, a petro water disposal or re-injection facility, or a petroleum pumping station, the plurality of instructions being received encoded in a shared protocol:



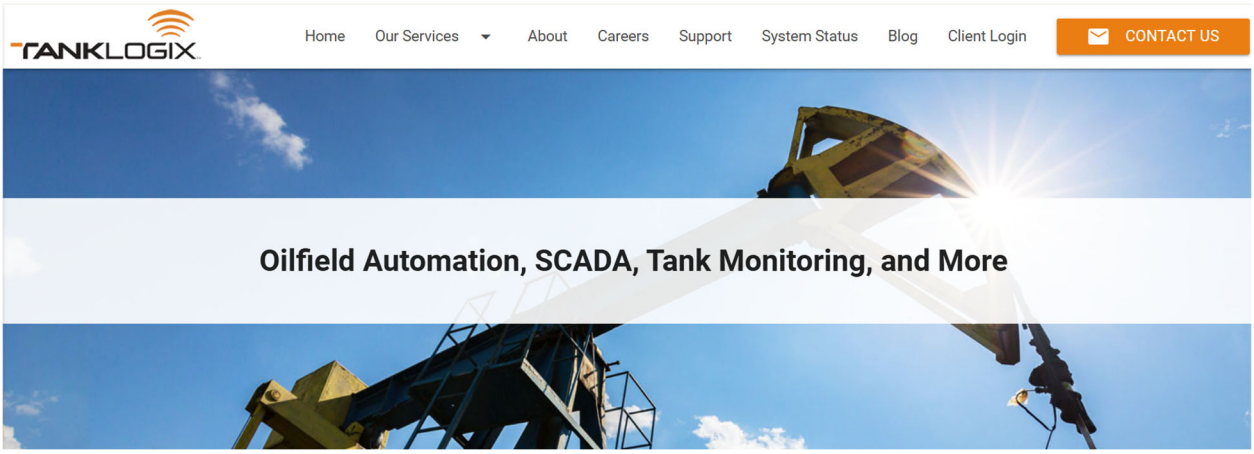
https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.



https://www.tanklogix.com/hosted-ignition/.



https://tanklogix.com/vfd-controls-and-motors/.

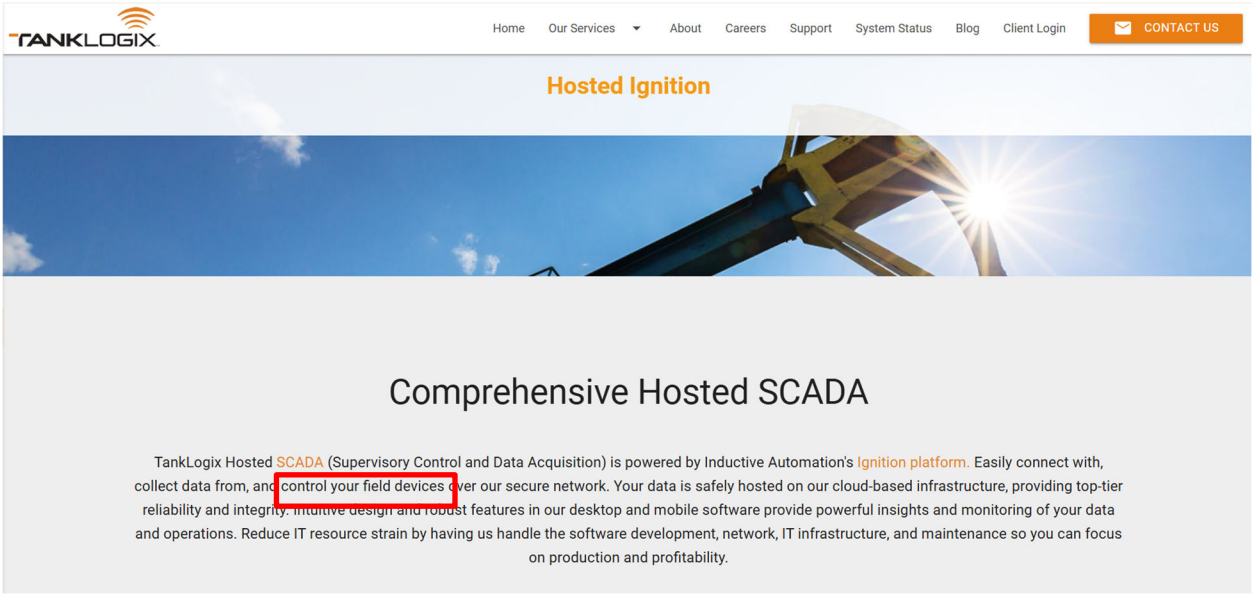


https://www.tanklogix.com/.

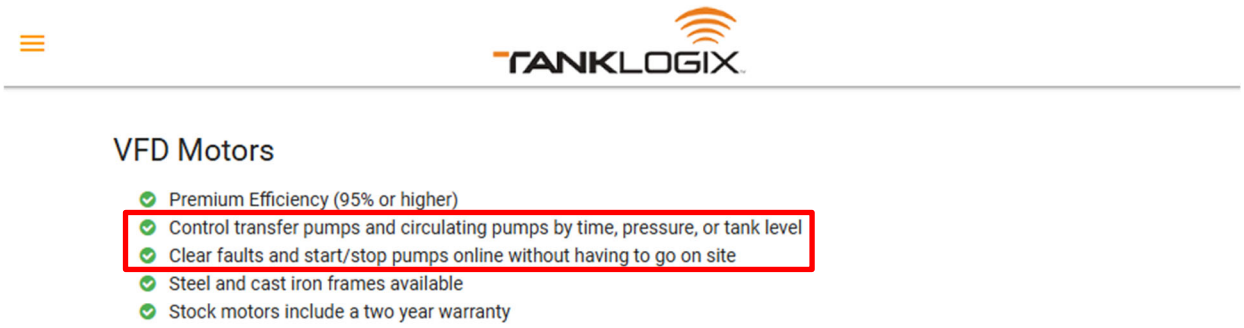
37. As shown in the example below, the Accused System further comprises obtaining a target state of at least one of the fluid-handling devices based on at least some of the plurality of instructions:

https://tanklogix.com/vfd-controls-and-motors/. For example, the Accused System obtains a target state (e.g., on/off, time, pressure, tank level) based on at least some of the plurality of instructions.

38. As shown in the examples below, the Accused System further comprises after receiving the instructions, determining a plurality of different target states of the at least one of the fluid-handling devices, the plurality of different states each corresponding to different times:



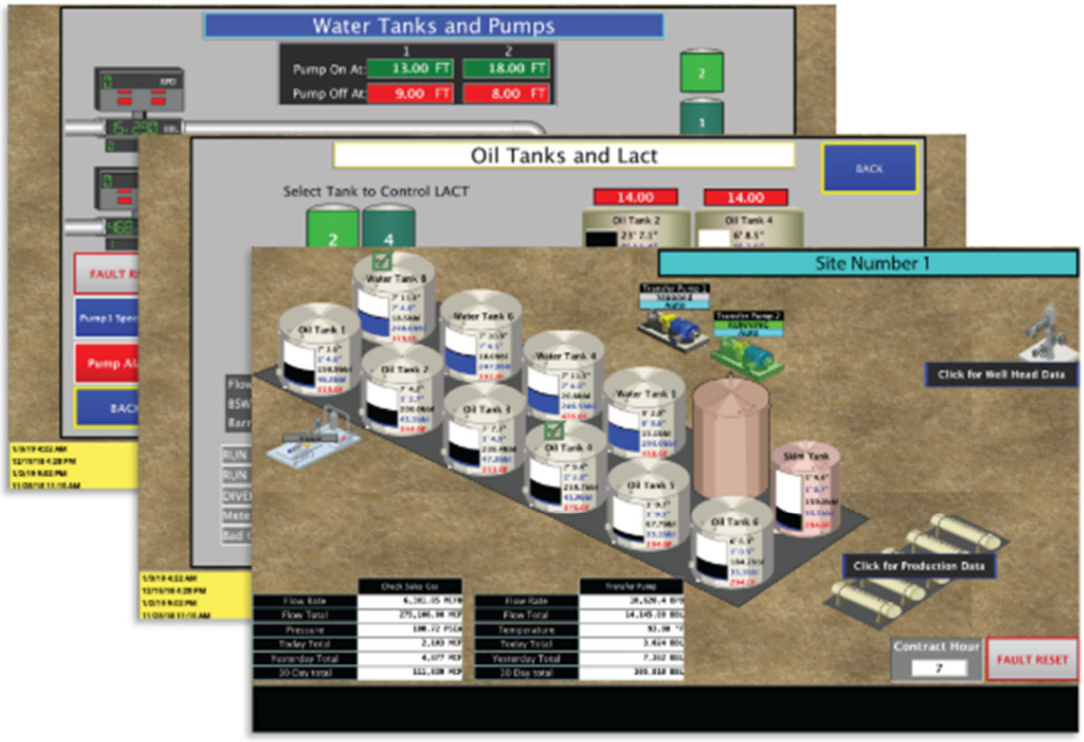
https://www.tanklogix.com/hosted-ignition/.

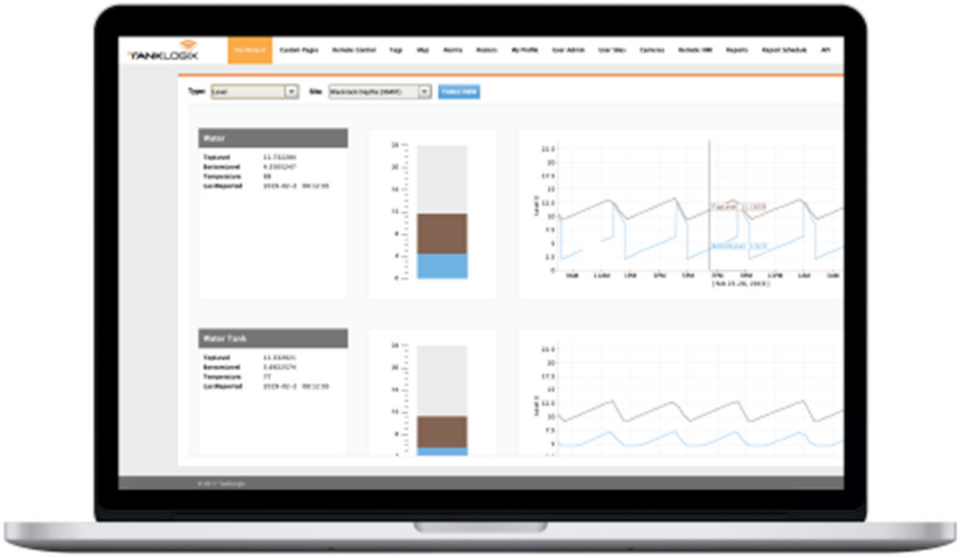


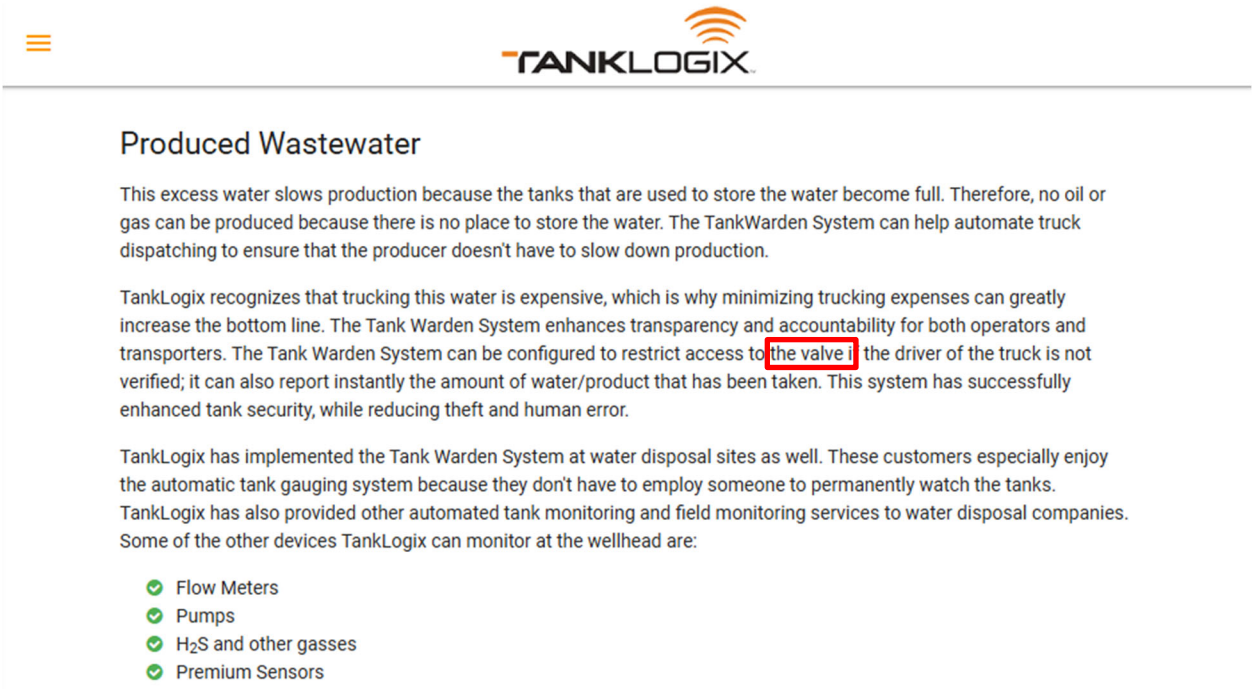
https://tanklogix.com/vfd-controls-and-motors/. On information and belief, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time. As another example, a plurality of

commands could be entered by a user device that comprise a plurality of target states at different times.

39. As shown in the example below, the Accused System further comprises for each of the plurality of instructions, selecting a respective protocol or protocols from among a plurality of protocols different from the shared protocol, wherein the respective fluid-handling device or devices to which the respective instruction is directed are responsive to the selected respective protocol or protocols, wherein at least some of the selected protocols are different from one another:



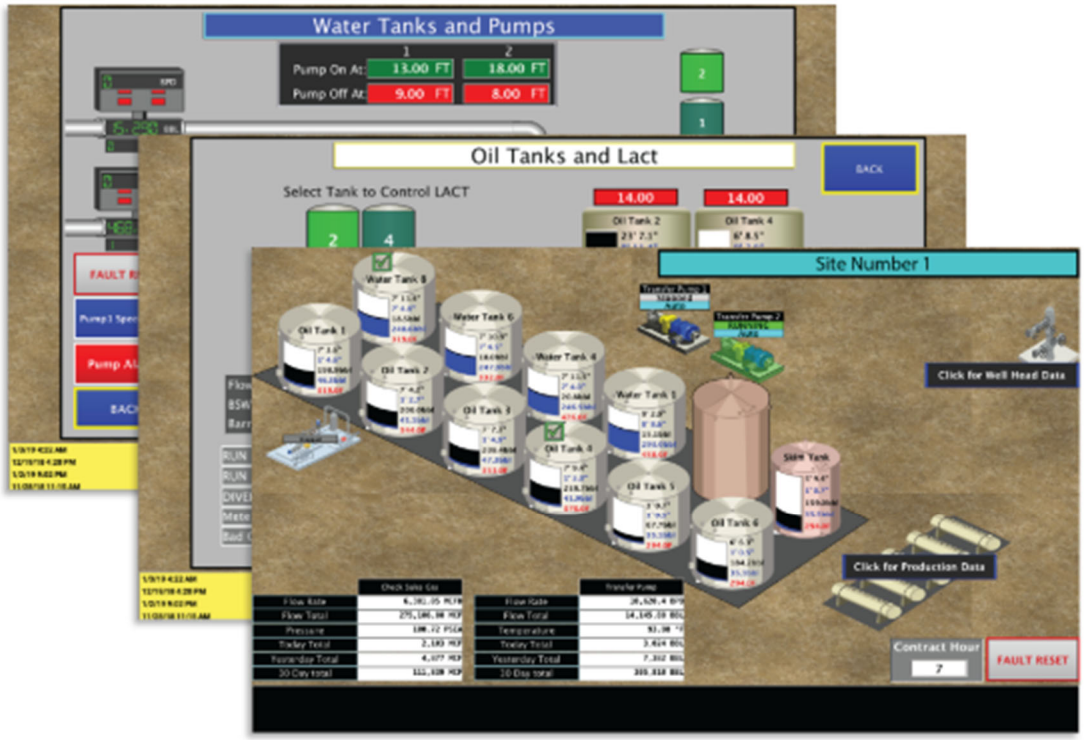


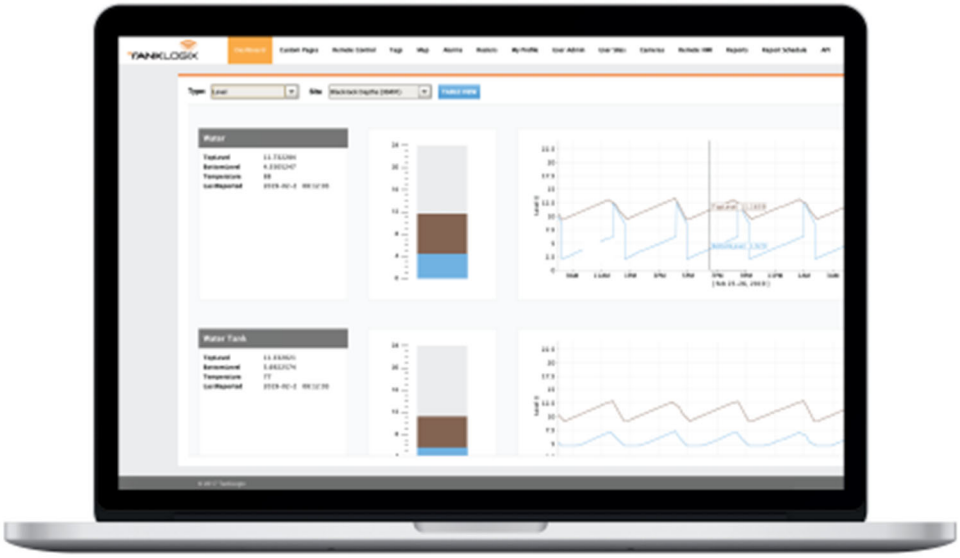


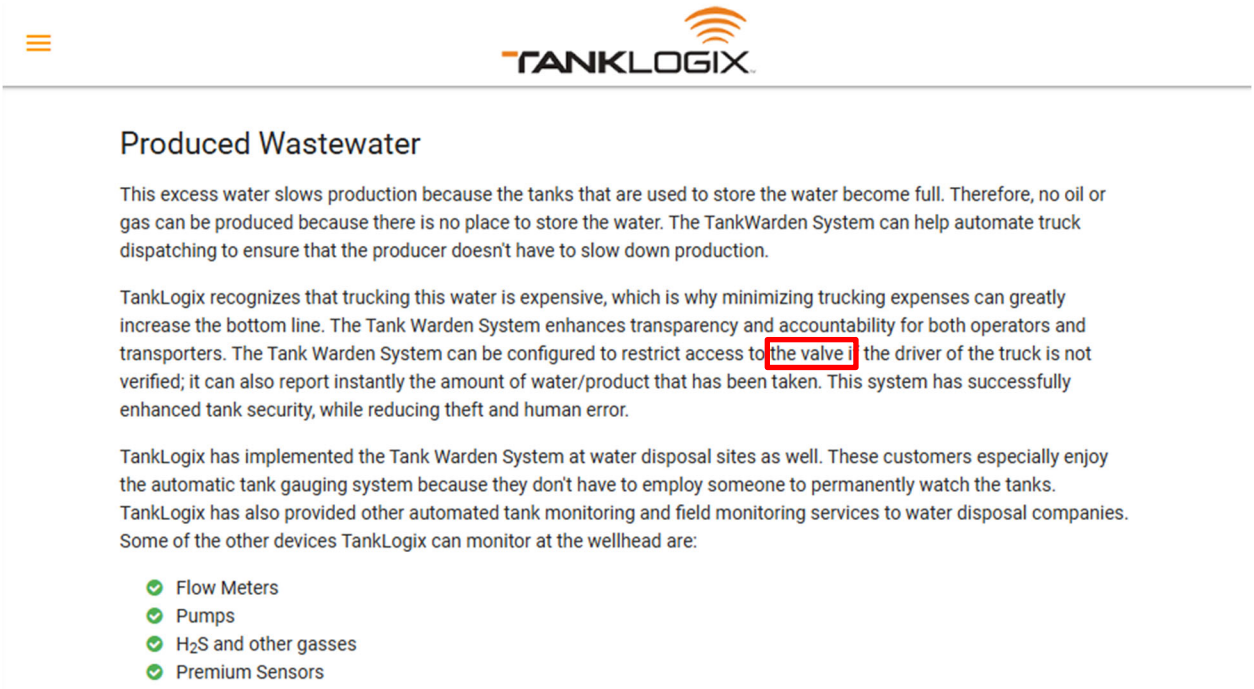
https://www.tanklogix.com/hosted-ignition/. The Accused System supports communication with a variety of fluid-handling devices, including at least valves, tanks, pumps, flow meters, and sensors. On information and belief, these various fluid-handling devices are responsive to different protocols (e.g., analog in, digital in, Modbus, etc.), and the Accused System selects a protocol

different from the shared protocol (e.g. TCP/IP) such that the fluid-handling device is responsive to the respective protocol.

40. As shown in the example below, the Accused System further comprises after determining the plurality of different target states, translating each received instructions into one or more translated instructions encoded in the selected respective protocol or protocols, the one or more translated instructions including the determined plurality of different target states:



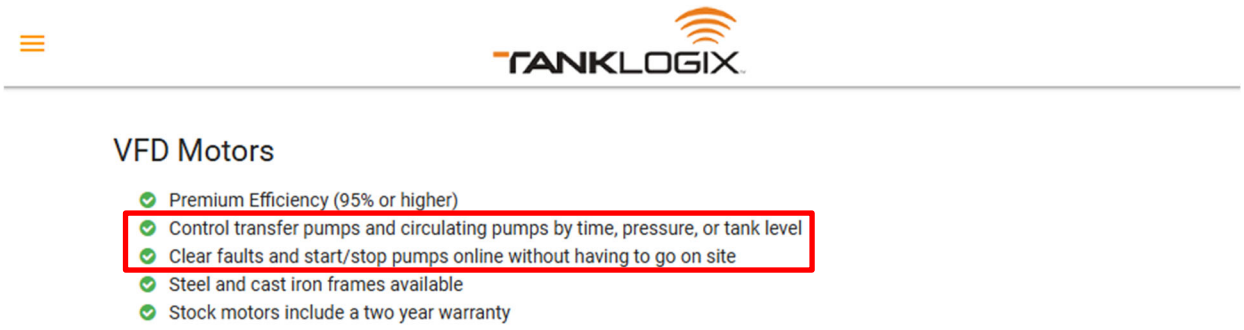




https://www.tanklogix.com/hosted-ignition/. On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols, such as digital or analog outputs understood by the various fluid-handling devices. The Accused System supports communication with a variety of fluid-handling devices, including at least valves, tanks, pumps, flow meters, and sensors. On information and belief, these various

fluid-handling devices are responsive to different protocols (e.g., analog in, digital in, Modbus, etc.), and the Accused System selects a protocol different from the shared protocol (e.g. TCP/IP) such that the fluid-handling device is responsive to the respective protocol.

41. As shown in the example below, the Accused System further comprises sending each translated instructions to at least the fluid-handling device to which the respective translated instruction is directed, wherein at least some of the translated instructions are effective to cause the at least one of the fluid-handling devices to attempt to achieve the target state:



https://tanklogix.com/vfd-controls-and-motors/.

42. As a result of TankLogix's infringement of the '078 Patent, SitePro has been damaged and is entitled to recover from TankLogix the damages sustained by SitePro as a result of TankLogix's acts in an amount adequate to compensate SitePro for TankLogix's infringement, subject to proof at trial.

43. TankLogix's knowing, willful, and deliberate infringement of the claims of the '078 Patent is in conscious disregard of SitePro's rights, makes this case exceptional within the meaning of 35 U.S.C. § 285, and justifies treble damages pursuant to 35 U.S.C. § 284, as well as attorneys' fees pursuant to 35 U.S.C. § 285.

44. To the extent TankLogix continues to implement other systems that are similar to the Accused System, and/or utilize Ignition or similar platforms, such activities constitute continued willful infringement by TankLogix.

COUNT II

TankLogix's Infringement of the U.S. Patent Nos. 10,488,871

45. SitePro repeats and realleges as if fully set forth herein, the allegations set forth in the foregoing paragraphs of this Complaint.

46. TankLogix directly infringed and continues to directly infringe, under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, at least claims 18-34 of the '871 Patent by manufacturing, using, selling, offering to sell, and/or importing into the United States the Accused System.

47. TankLogix has been and is indirectly infringing the '871 Patent by actively inducing or contributing to the direct infringement by others of the '871 Patent in the United States, the State of Texas, and this District.

48. TankLogix also has been and is now knowingly and intentionally inducing infringement of at least claims 18-34 of the '871 Patent in violation of 35 U.S.C. § 271(b). TankLogix has had knowledge of the '871 Patent and the infringing nature of the Accused System and other similar systems since at least the filing and service of this Complaint.

49. TankLogix specifically intended and was aware that the ordinary and customary use of the Accused System and other similar systems would infringe the '871 Patent.

50. TankLogix further took active steps to encourage end users to use and operate the Accused System and other similar systems, despite knowing of the '871 Patent, in a manner they knew to directly infringe at least claims 18-34 of the '871 Patent. Further, TankLogix provided product manuals and other technical information that cause their subscribers, customers, and other

third parties to use and to operate the Accused System and other systems for their ordinary and customary use, such that TankLogix's customers and other third parties have directly infringed the '871 Patent, through the normal and customary use of the Accused System and other similar systems.

51. TankLogix also has been and are now in violation of 35 U.S.C. § 271(c) by contributing to infringement of at least claims 18-34 of the '871 Patent, literally and/or under the doctrine of equivalents, by, among other things, selling, offering for sale, and/or importing within this judicial district and elsewhere in the United States, the Accused System and other similar systems with knowledge of the '871 Patent and knowing that the Accused System and other similar systems are especially made or especially adapted for use in the infringement of the '871 Patent, and is not a staple article or commodity of commerce suitable for substantial noninfringing use.

52. TankLogix's infringement (both direct and indirect) of the '871 Patent has been, and continues to be, with full knowledge of the '871 Patent, since at least as early as the filing of this lawsuit, or as early as TankLogix employees have accessed the patent information on SitePro's website.

53. For example, Claim 18 of the '871 Patent recites:

A method, comprising:

storing, with one or more processors, records comprising:

> a plurality of accounts, each account corresponding to an entity operating one or more geographically distributed fluid-handling facilities, the accounts associating different fluid-handling facilities with different entities; and
>
> addresses by which industrial monitoring or control equipment at the facilities is accessible via network connections, the monitoring or control equipment including sensors configured to measure fluid handled at respective fluid-handling facilities and actuators configured to manipulate fluid flow at respective fluid-handling facilities, at least some of the fluid-handling facilities including both a plurality of the sensors and a plurality of the actuators;

obtaining, with one or more processors implementing a facility-interface module or modules, data from the sensors at the facilities and send commands to the actuators at the facilities via the network connections; and

sending, with one or more processors implementing a user-interface module or modules, respective instructions to present respective control interfaces on respective user-computing devices logged in to respective ones of the accounts and to receive respective commands to control respective actuators from the respective user computing devices;

receiving, with the user-interface module or modules, a user command to actuate an actuator entered via a presented control interface;

identifying, with one or more processors, in response to the user command, an address in the datastore corresponding to a facility at which the actuator is located; and

sending, with one or more processors, instructions with the facility-interface module or modules to the facility to actuate the actuator, wherein:

the plurality of accounts include a first account, a second account, a third account, and a fourth account;

the first account corresponds to a first group of fluid-handling facilities, one or more users of the first account being authorized to send commands to remotely control fluid handling devices at the first group of fluid-handling facilities;

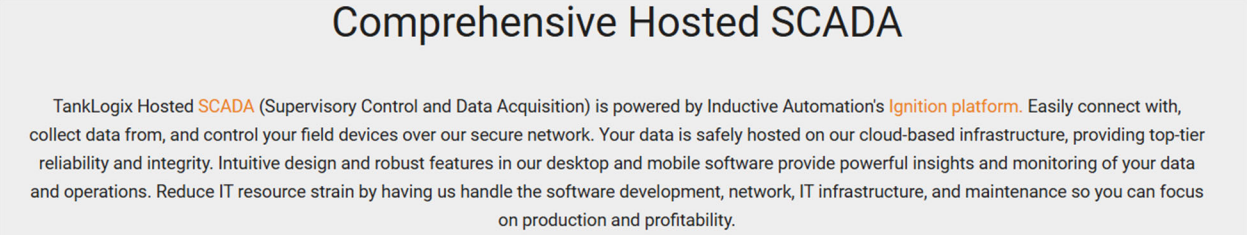
the second account corresponds to a second group of fluid-handling facilities, the first group being different from the second group, one or more users of the second account being authorized to send commands to remotely control fluid handling devices at the second group of fluid-handling facilities;

the third account corresponds to the first group of fluid-handling facilities, one or more users of the of the third account being authorized to view reports of data from fluid handling devices at the first group of fluid-handling facilities; and

the fourth account corresponds to the second group of fluid-handling facilities, one or more users of the of the fourth account being authorized to view reports of data from fluid handling devices at the second group of fluid-handling facilities.

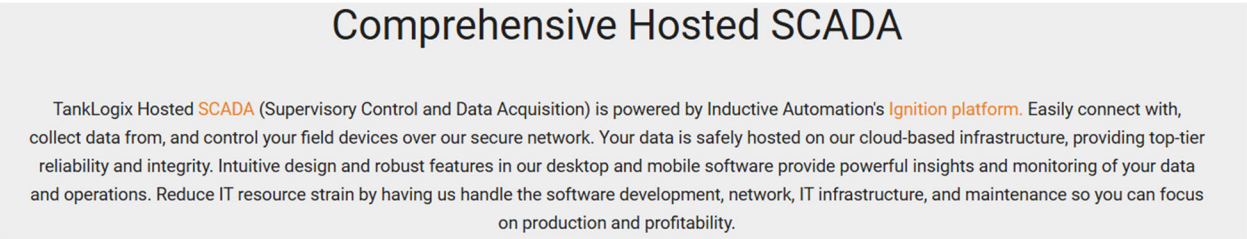
54. By way of example, the Accused System meets every element of Claim 18.

55. To the extent the preamble is found limiting, the Accused System performs a method as claimed:



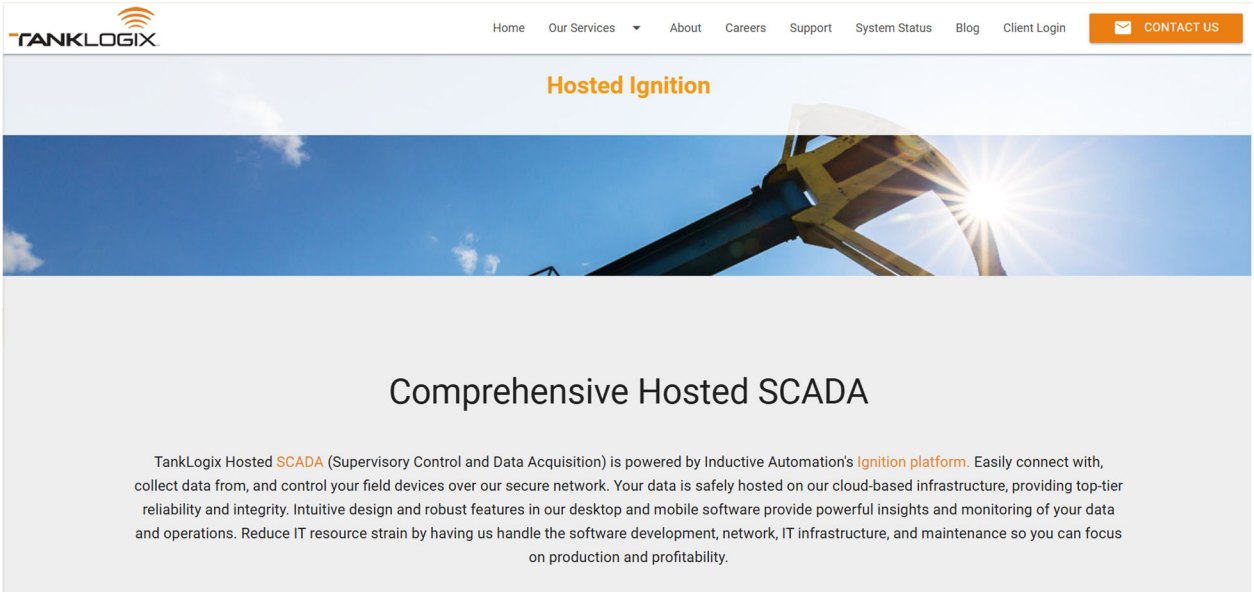
https://www.tanklogix.com/hosted-ignition/.

56. As shown in the example below, the Accused System further comprises storing, with one or more processors, records comprising:

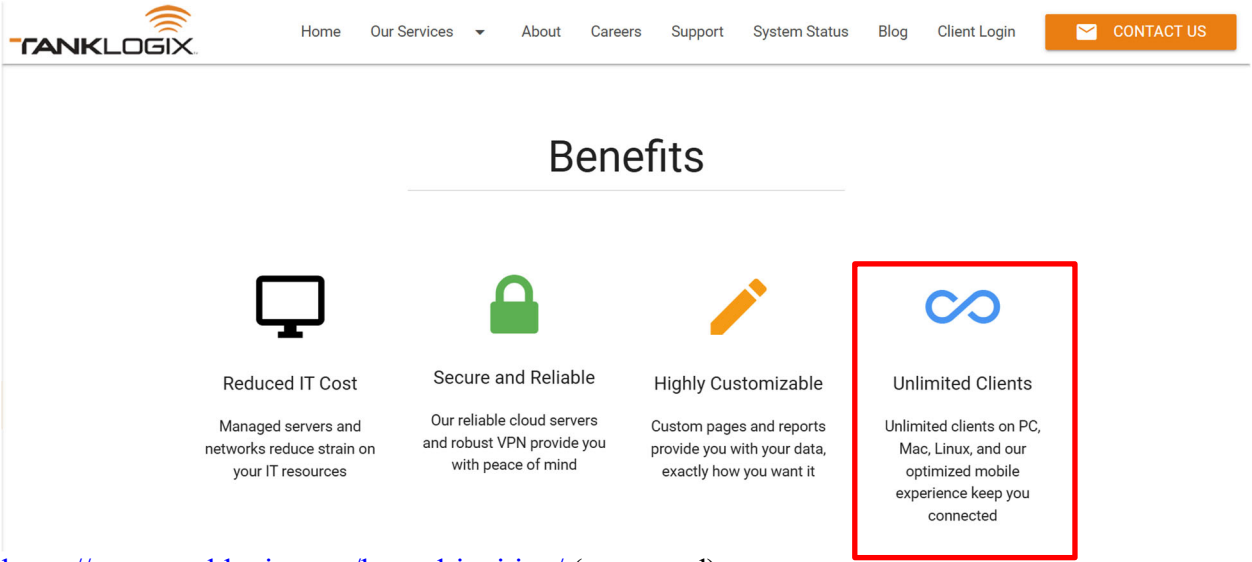


https://www.tanklogix.com/hosted-ignition/.

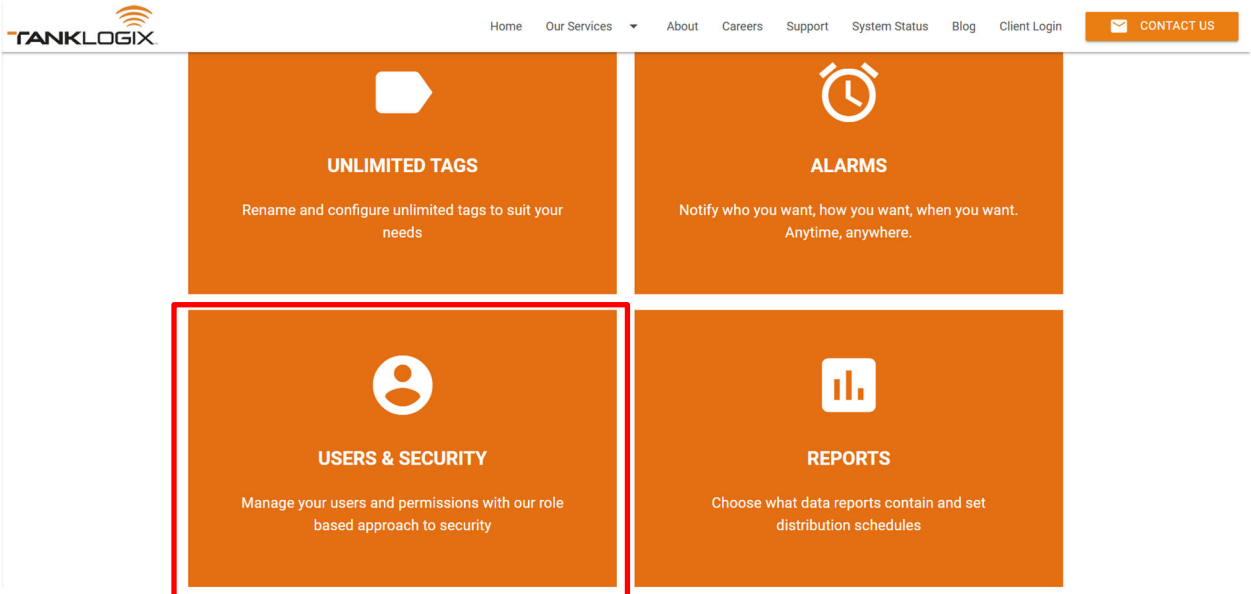
57. As shown in the example below, the Accused System further comprises a plurality of accounts, each account corresponding to an entity operating one or more geographically distributed fluid-handling facilities, the accounts associating different fluid-handling facilities with different entities:



https://www.tanklogix.com/hosted-ignition/. On information and belief, TankLogix Hosted Ignition products comprise a command center server that provides access to TankLogix customer organizations (different entities) to monitor field devices (oil wells, petro water disposal or re-injection facilities, or petroleum pumping stations). As in the examples shown below, each customer organization (different entity) can access the system via unlimited clients and can manage multiple user accounts.

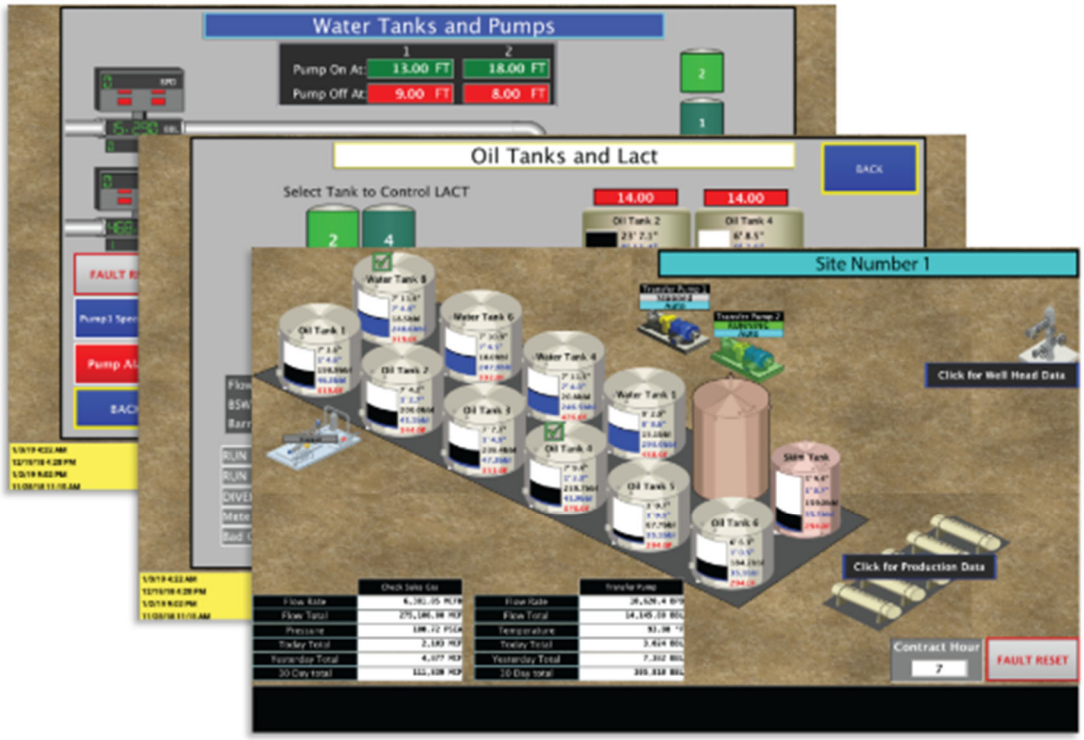


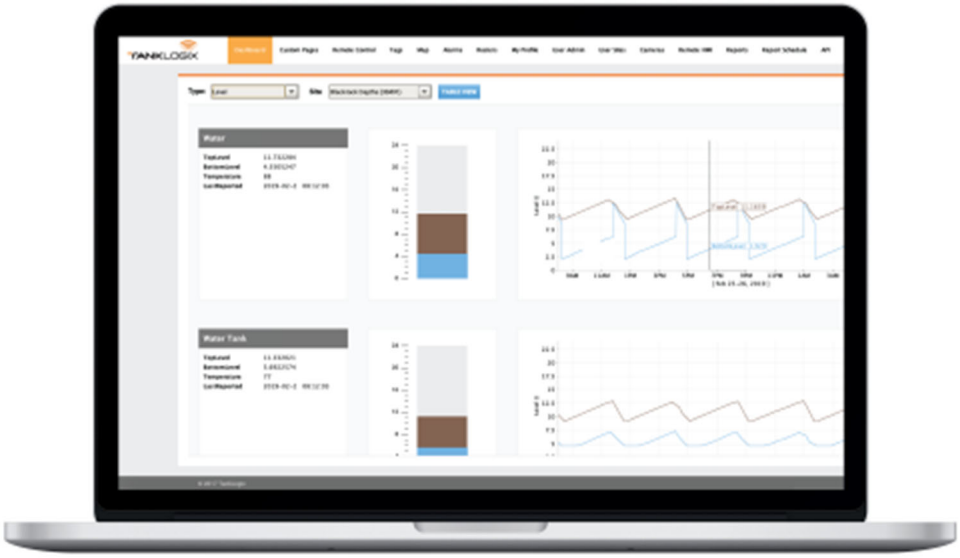
https://www.tanklogix.com/hosted-ignition/ (annotated).



https://www.tanklogix.com/hosted-ignition/ (annotated).

58. As shown in the example below, the Accused System further comprises addresses by which industrial monitoring or control equipment at the facilities is accessible via network connections, the monitoring or control equipment including sensors configured to measure fluid handled at respective fluid-handling facilities and actuators configured to manipulate fluid flow at respective fluid-handling facilities, at least some of the fluid-handling facilities including both a plurality of the sensors and a plurality of the actuators:





TANKLOGIX

Produced Wastewater

This excess water slows production because the tanks that are used to store the water become full. Therefore, no oil or gas can be produced because there is no place to store the water. The TankWarden System can help automate truck dispatching to ensure that the producer doesn't have to slow down production.

TankLogix recognizes that trucking this water is expensive, which is why minimizing trucking expenses can greatly increase the bottom line. The Tank Warden System enhances transparency and accountability for both operators and transporters. The Tank Warden System can be configured to restrict access to the valve i the driver of the truck is not verified; it can also report instantly the amount of water/product that has been taken. This system has successfully enhanced tank security, while reducing theft and human error.

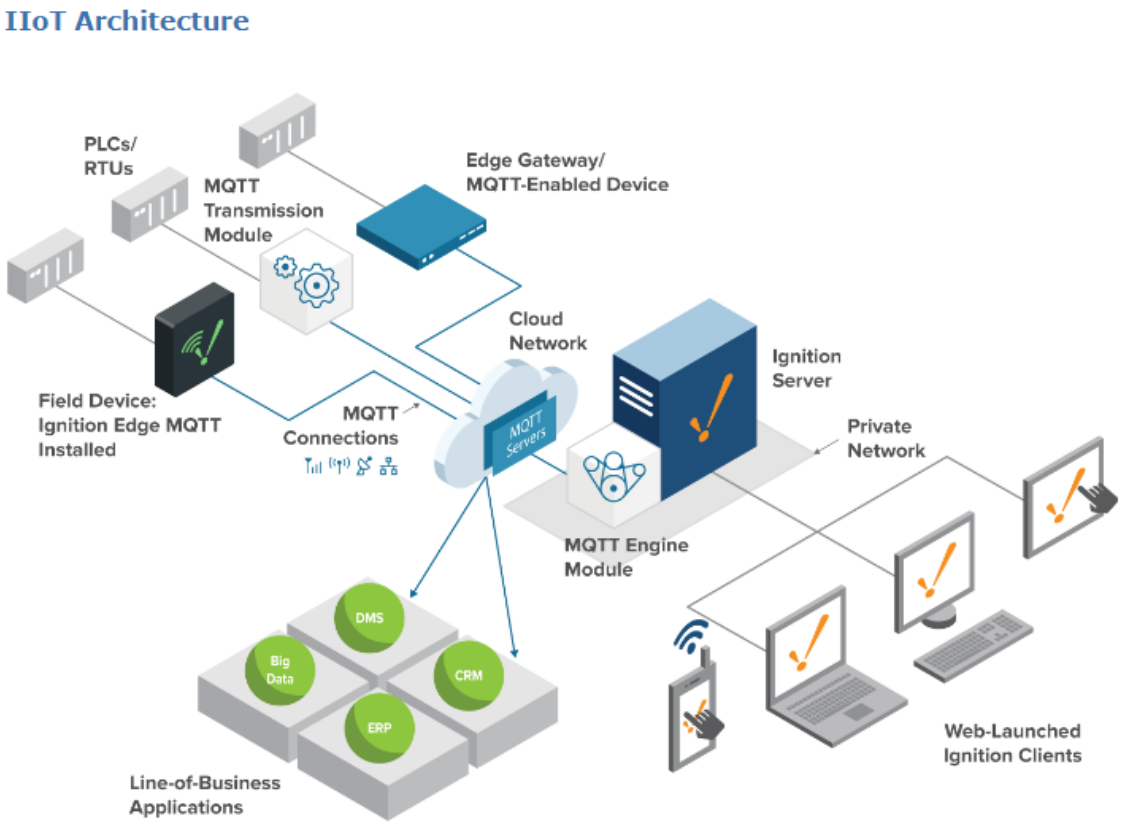
TankLogix has implemented the Tank Warden System at water disposal sites as well. These customers especially enjoy the automatic tank gauging system because they don't have to employ someone to permanently watch the tanks. TankLogix has also provided other automated tank monitoring and field monitoring services to water disposal companies. Some of the other devices TankLogix can monitor at the wellhead are:

- Flow Meters
- Pumps
- H_2S and other gasses
- Premium Sensors

https://www.tanklogix.com/hosted-ignition/.

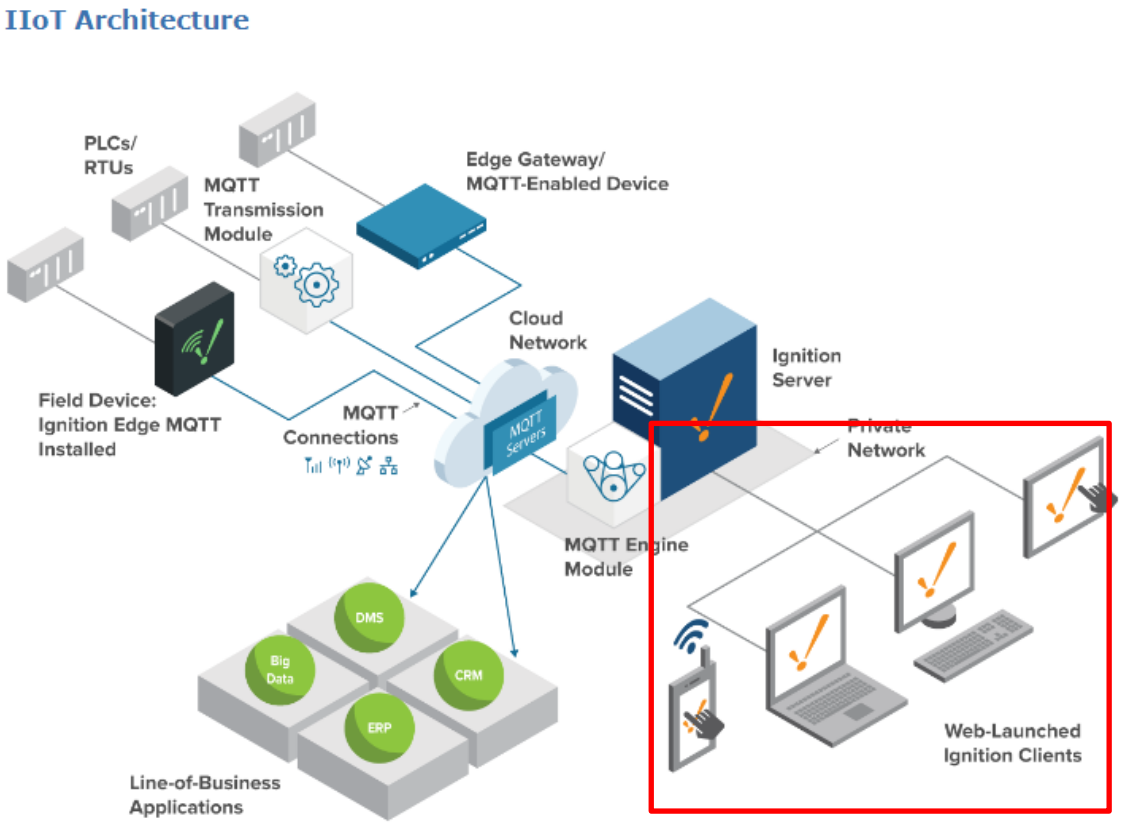
https://tanklogix.com/vfd-controls-and-motors/.

59. As shown in the example below, the Accused System further comprises obtaining, with one or more processors implementing a facility-interface module or modules, data from the sensors at the facilities and send commands to the actuators at the facilities via the network connections:



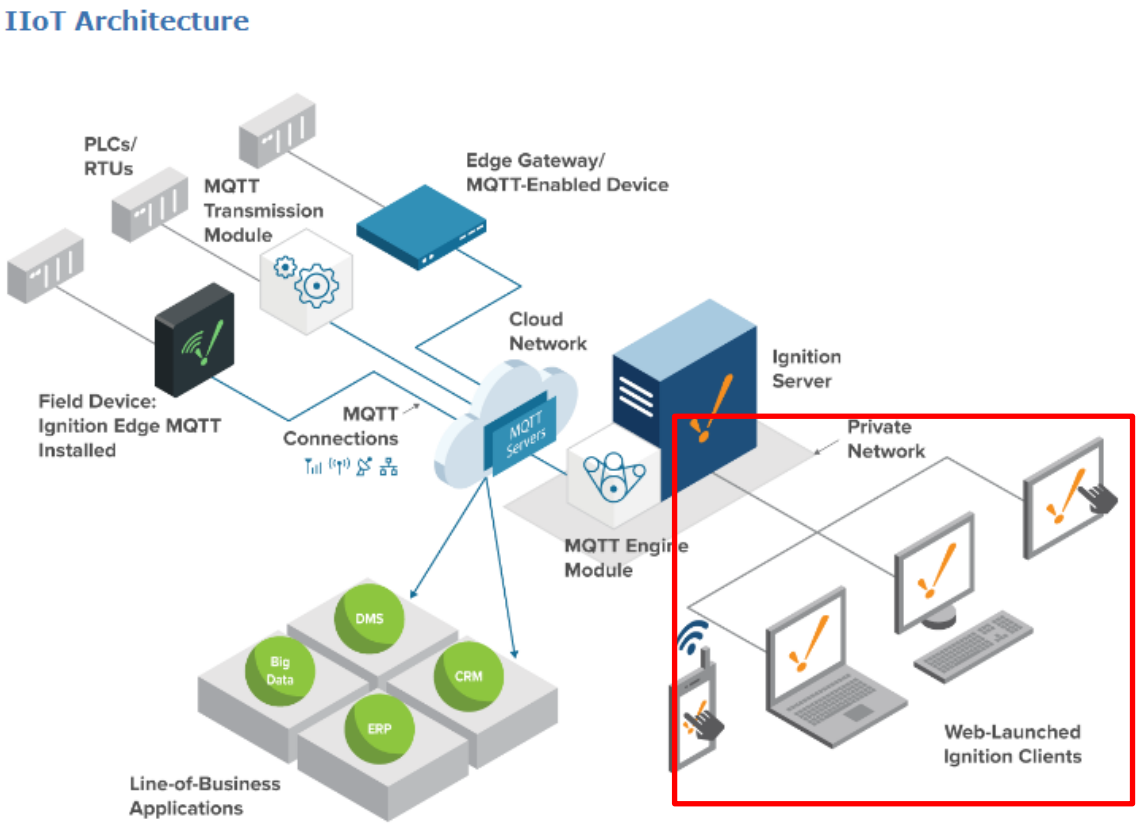
https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.

60. As shown in the example below, the Accused System further comprises sending, with one or more processors implementing a user-interface module or modules, respective instructions to present respective control interfaces on respective user-computing devices logged in to respective ones of the accounts and to receive respective commands to control respective actuators from the respective user computing devices:

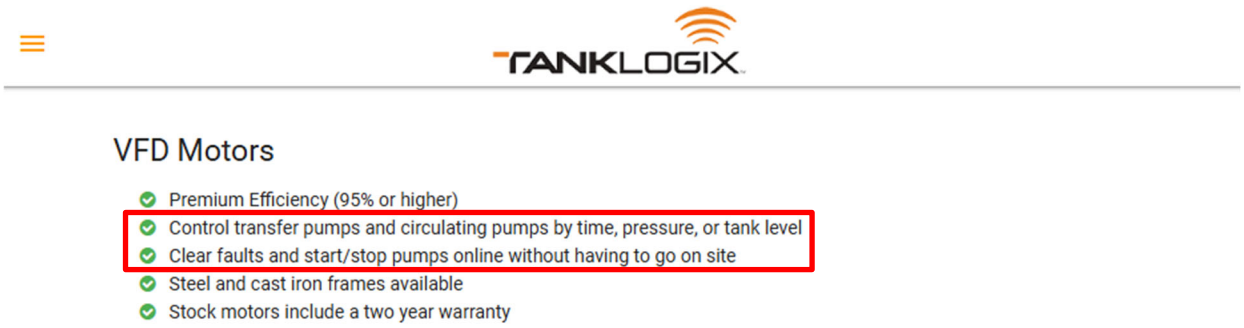


https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.

61. As shown in the example below, the Accused System further comprises receiving, with the user-interface module or modules, a user command to actuate an actuator entered via a presented control interface:

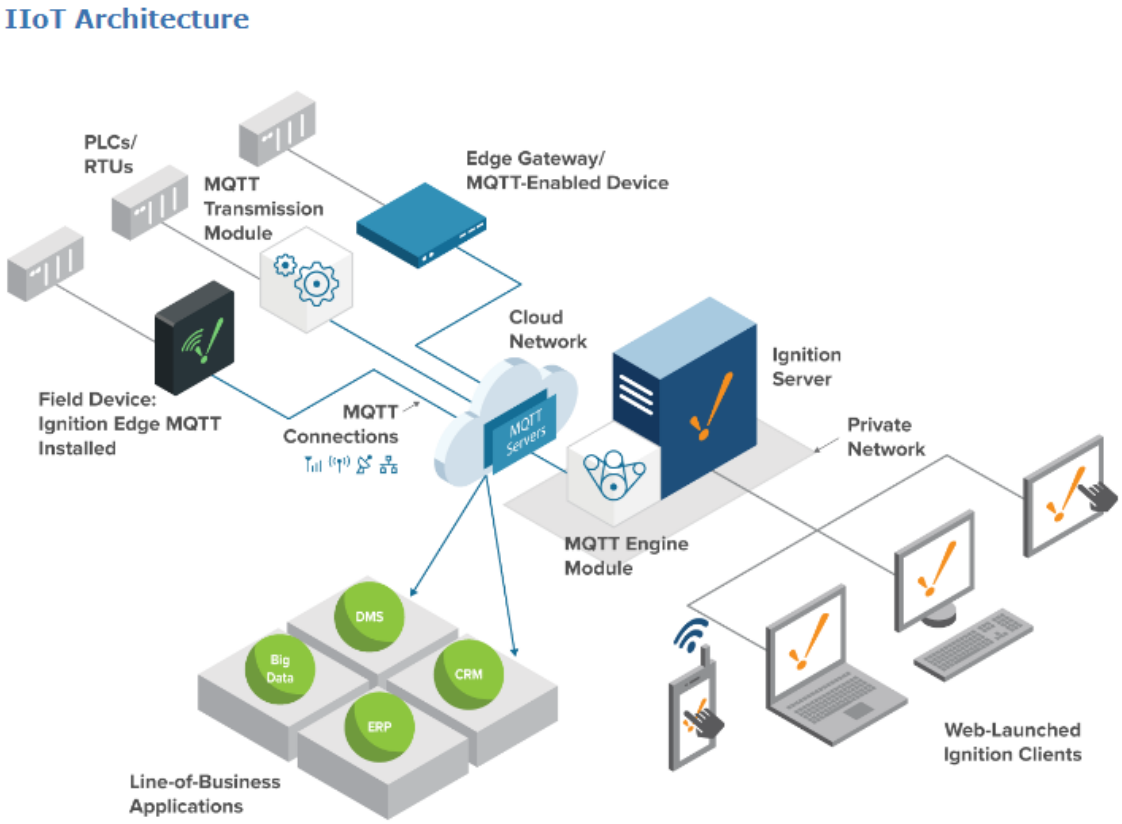


https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.



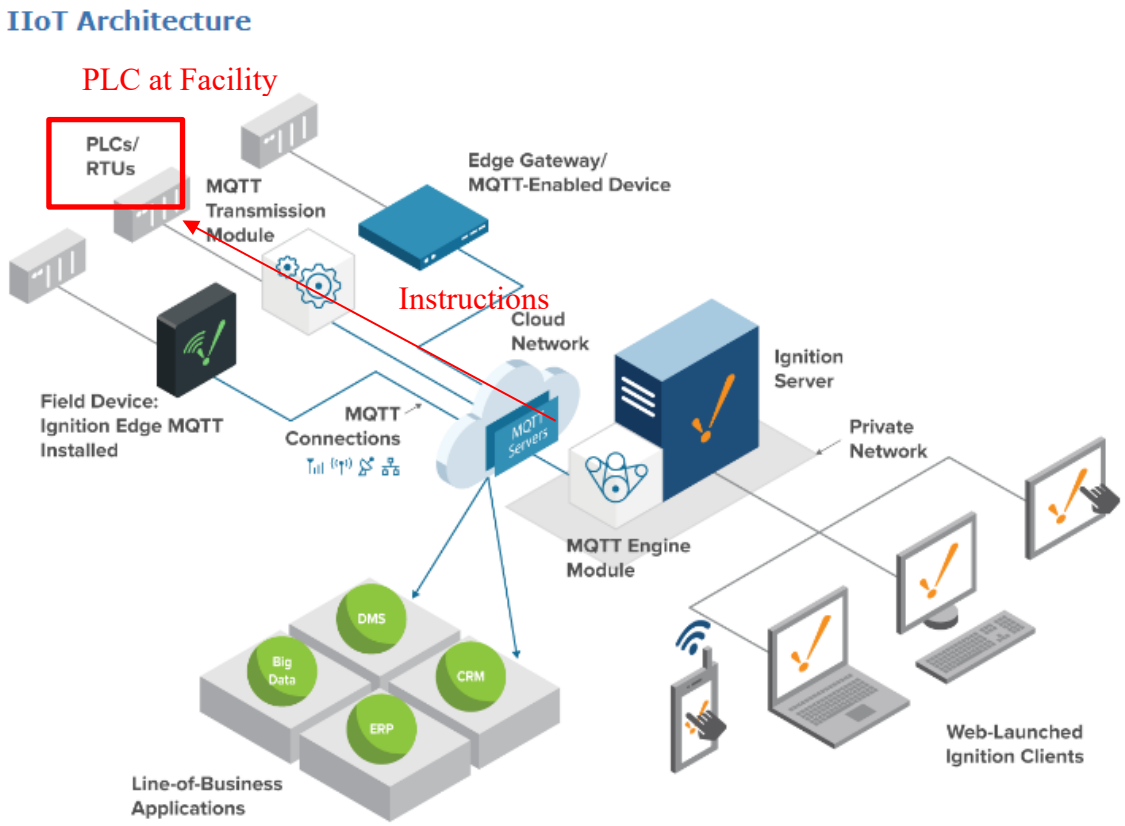
https://tanklogix.com/vfd-controls-and-motors/.

62. As shown in the example below, the Accused System further comprises identifying, with one or more processors, in response to the user command, an address in the datastore corresponding to a facility at which the actuator is located:



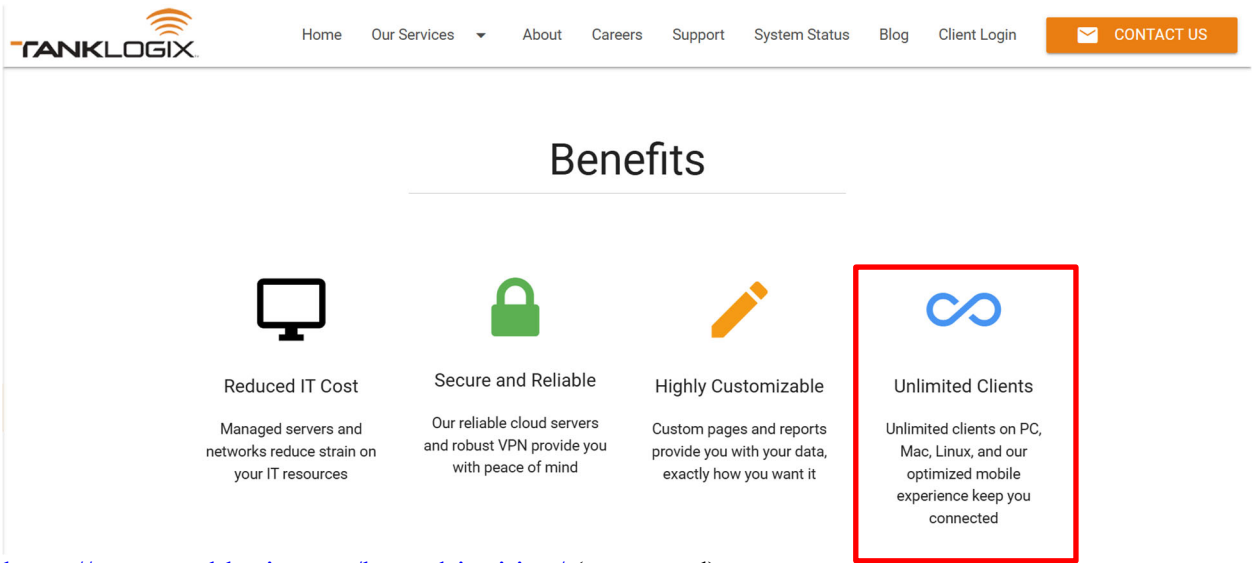
https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.

63. As shown in the example below, the Accused System further comprises sending, with one or more processors, instructions with the facility-interface module or modules to the facility to actuate the actuator:



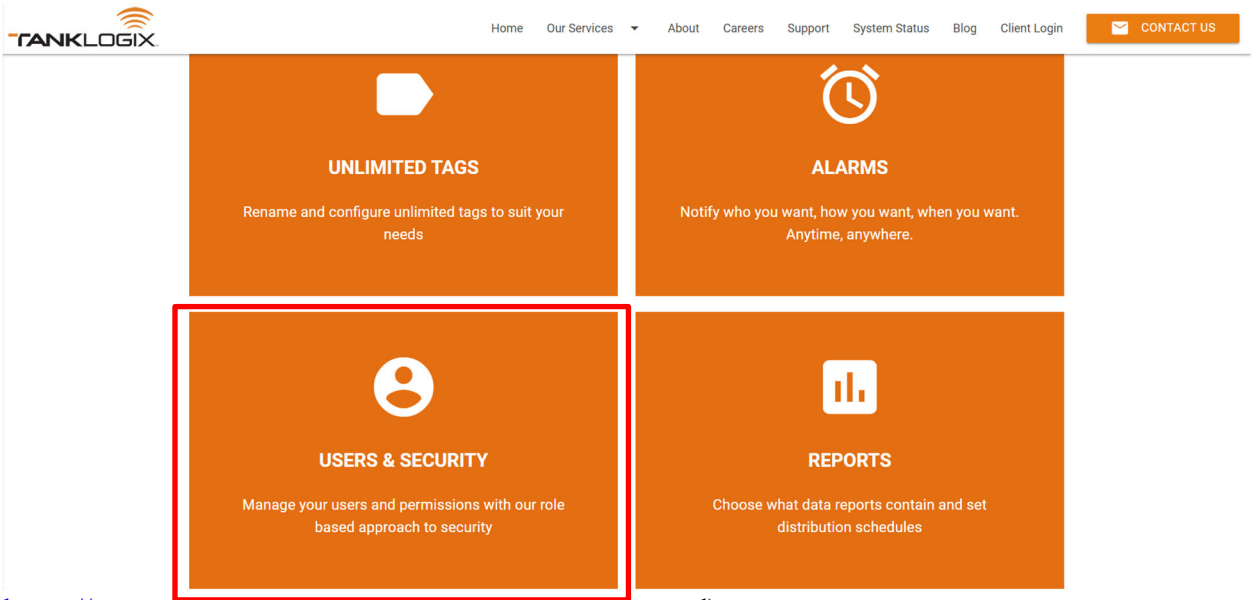
https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.

64. As shown in the example below, the Accused System further comprises a plurality of accounts including a first account, a second account, a third account, and a fourth account:



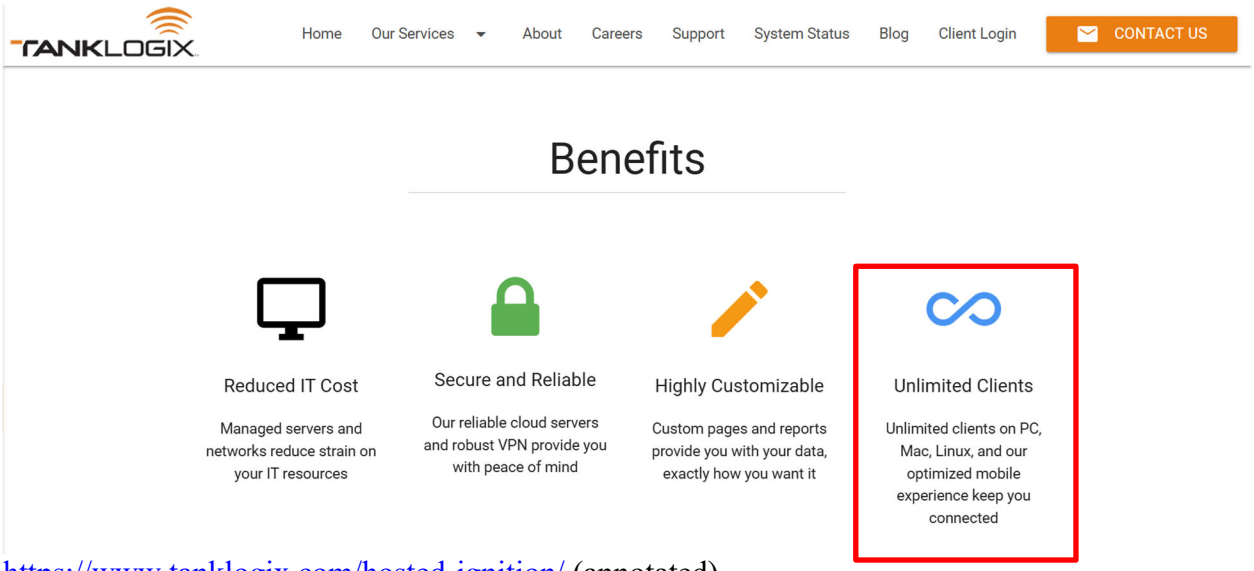
https://www.tanklogix.com/hosted-ignition/ (annotated).

65. On information and belief, TankLogix Hosted Ignition products provide access to TankLogix customer organizations (different entities) to monitor field devices (oil wells, petro water disposal or re-injection facilities, or petroleum pumping stations). As in the examples shown below, each customer organization (different entity) can access the system via unlimited clients and can manage multiple user accounts, including at least a first account, second account, third account and a fourth account:

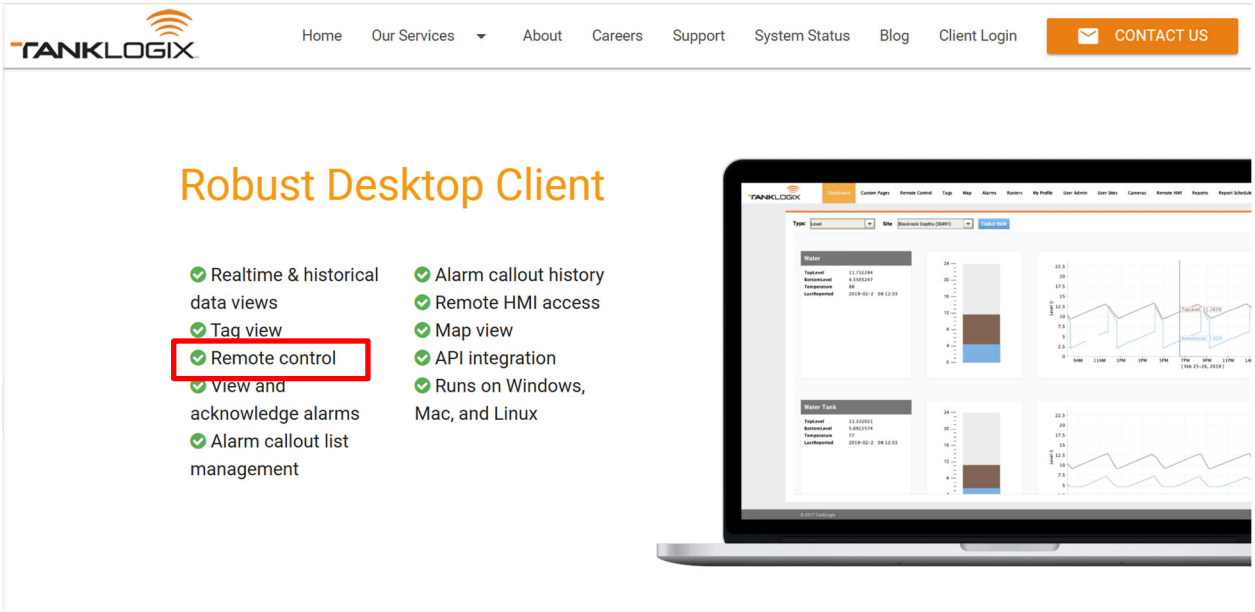


https://www.tanklogix.com/hosted-ignition/ (annotated).

66. As shown in the example below, the Accused System further comprises a first account corresponding to a first group of fluid-handling facilities, one or more users of the first account being authorized to send commands to remotely control fluid handling devices at the first group of fluid-handling facilities:

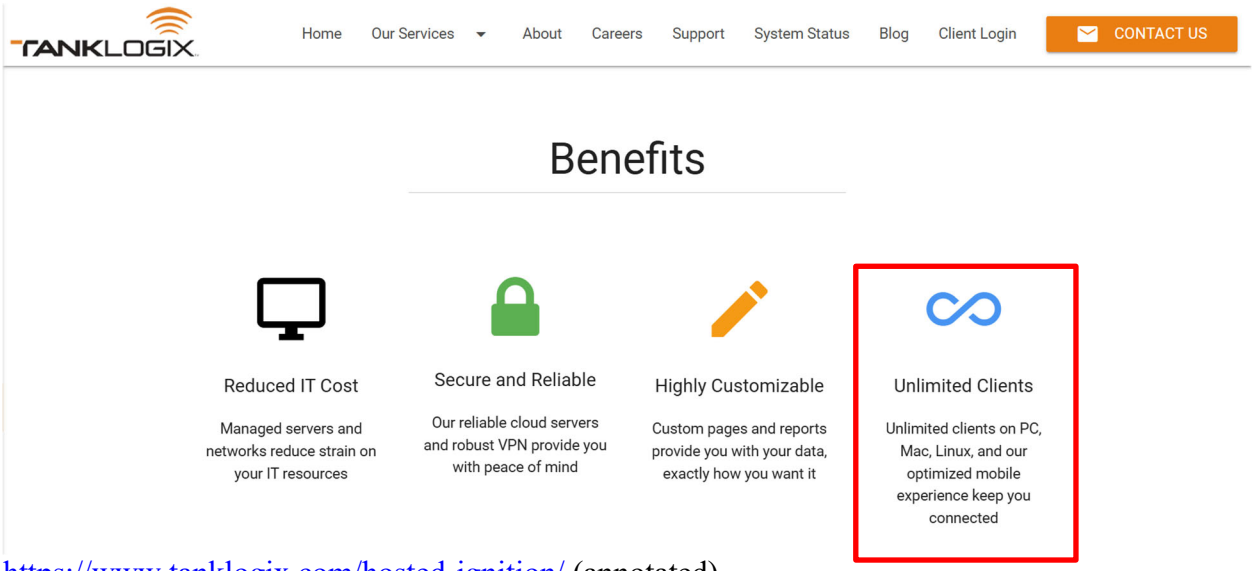


https://www.tanklogix.com/hosted-ignition/ (annotated).

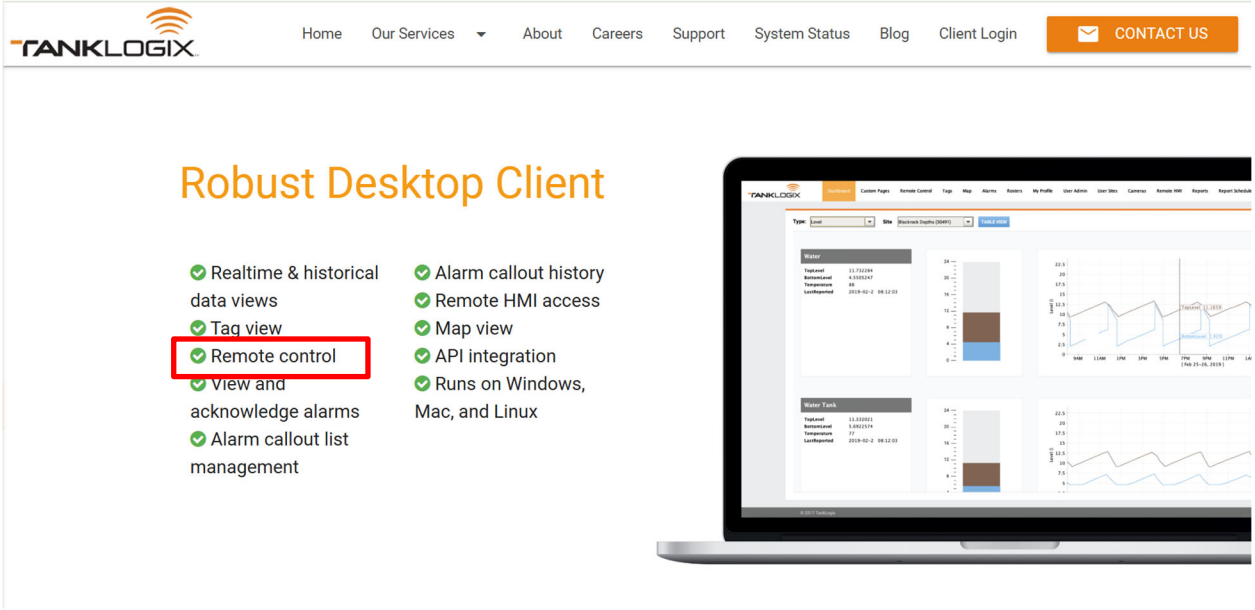


https://www.tanklogix.com/hosted-ignition/ (annotated).

67. As shown in the example below, the Accused System further comprises a second account corresponding to a second group of fluid-handling facilities, the first group being different from the second group, one or more users of the second account being authorized to send commands to remotely control fluid handling devices at the second group of fluid-handling facilities:

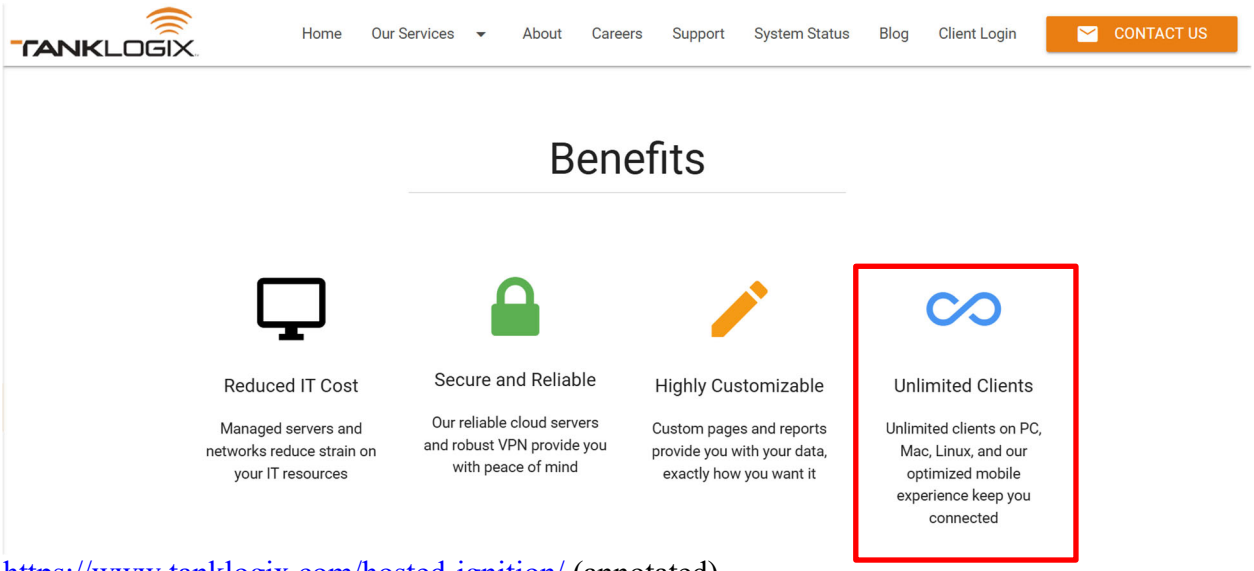


https://www.tanklogix.com/hosted-ignition/ (annotated).

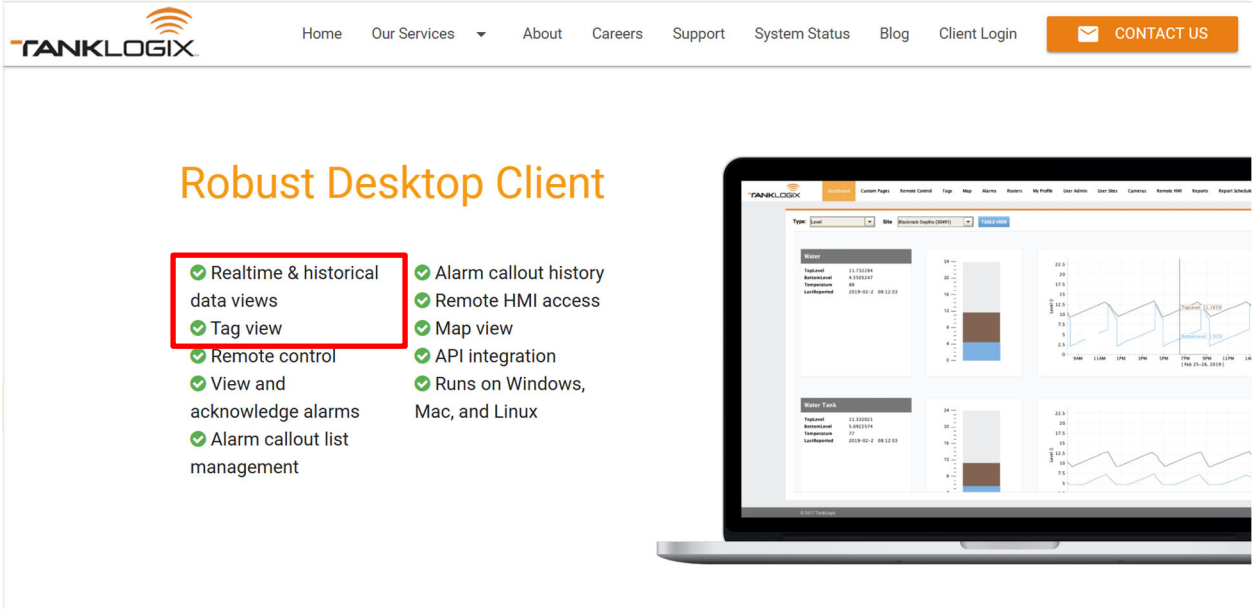


https://www.tanklogix.com/hosted-ignition/ (annotated).

68. As shown in the example below, the Accused System further comprises a third account corresponding to the first group of fluid-handling facilities, one or more users of the of the third account being authorized to view reports of data from fluid handling devices at the first group of fluid-handling facilities:

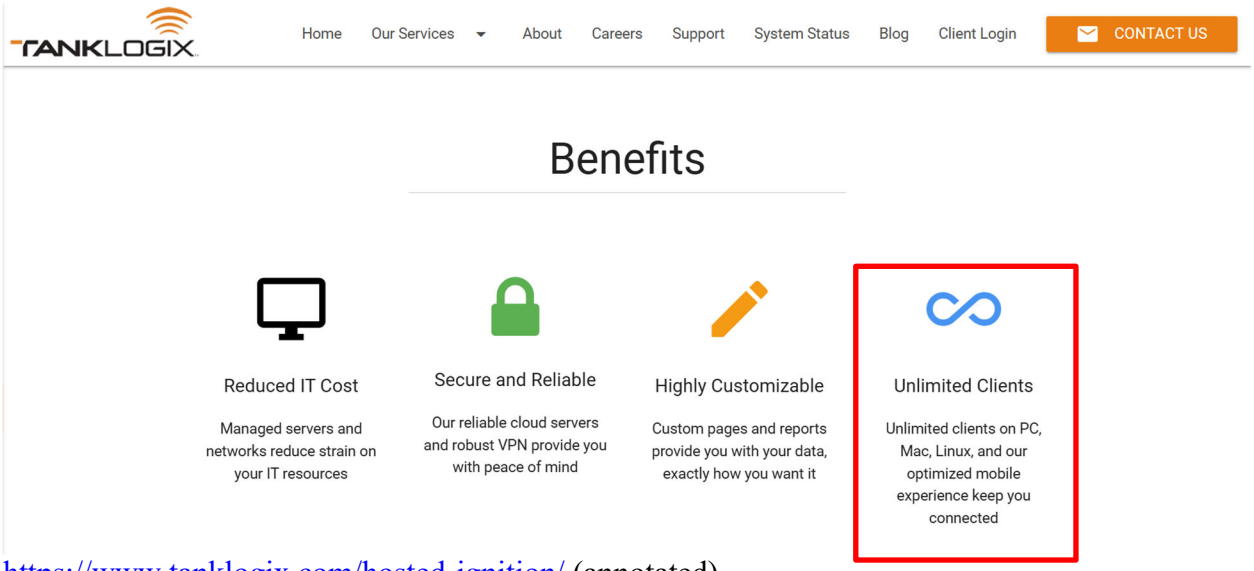


https://www.tanklogix.com/hosted-ignition/ (annotated).

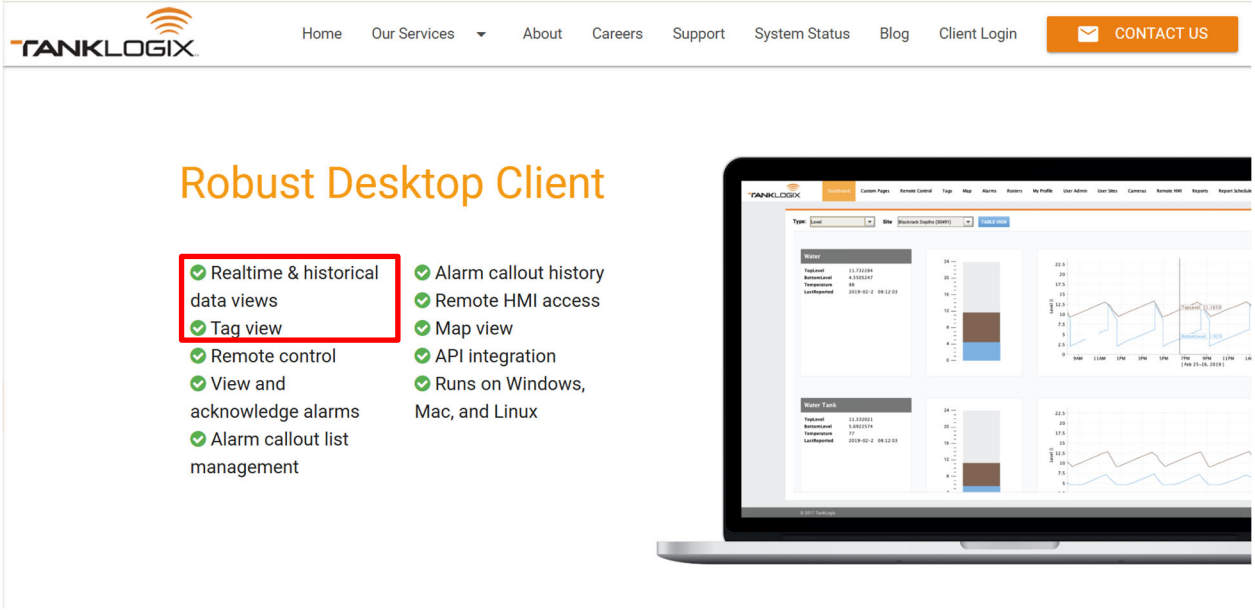


https://www.tanklogix.com/hosted-ignition/ (annotated).

69. As shown in the example below, the Accused System further comprises a fourth account corresponds to the second group of fluid-handling facilities, one or more users of the of the fourth account being authorized to view reports of data from fluid handling devices at the second group of fluid-handling facilities:



https://www.tanklogix.com/hosted-ignition/ (annotated).



https://www.tanklogix.com/hosted-ignition/ (annotated).

70. As a result of TankLogix's infringement of the '871 Patent, SitePro has been damaged and is entitled to recover from TankLogix the damages sustained by SitePro as a result of TankLogix's acts in an amount adequate to compensate SitePro for TankLogix's infringement, subject to proof at trial.

71. TankLogix's knowing, willful, and deliberate infringement of the claims of the '871 Patent is in conscious disregard of SitePro's rights, makes this case exceptional within the meaning

of 35 U.S.C. § 285, and justifies treble damages pursuant to 35 U.S.C. § 284, as well as attorneys' fees pursuant to 35 U.S.C. § 285.

72. To the extent TankLogix continues to implement other systems that are similar to the Accused System, and/or utilize Ignition or similar platforms, such activities constitute continued willful infringement by TankLogix.

COUNT III

TankLogix's Infringement of the U.S. Patent Nos. 11,294,403

73. SitePro repeats and realleges as if fully set forth herein, the allegations set forth in the foregoing paragraphs of this Complaint.

74. TankLogix directly infringed and continues to directly infringe, under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, at least claims 1-30 of the '403 Patent by manufacturing, using, selling, offering to sell, and/or importing into the United States the Accused System.

75. TankLogix has been and is indirectly infringing the '403 Patent by actively inducing or contributing to the direct infringement by others of the '403 Patent in the United States, the State of Texas, and this District.

76. TankLogix also has been and is now knowingly and intentionally inducing infringement of at least claims 1-30 of the '403 Patent in violation of 35 U.S.C. § 271(b). TankLogix has had knowledge of the '403 Patent and the infringing nature of the Accused System and other similar systems since at least the filing and service of this Complaint.

77. TankLogix specifically intended and was aware that the ordinary and customary use of the Accused System and other similar systems would infringe the '403 Patent.

78. TankLogix further took active steps to encourage end users to use and operate the Accused System and other similar systems, despite knowing of the '403 Patent, in a manner they

knew to directly infringe at least claims 1-30 of the ’403 Patent. Further, TankLogix provided product manuals and other technical information that cause their subscribers, customers, and other third parties to use and to operate the Accused System and other systems for their ordinary and customary use, such that TankLogix’s customers and other third parties have directly infringed the ’403 Patent, through the normal and customary use of the Accused System and other similar systems.

79. TankLogix also has been and are now in violation of 35 U.S.C. § 271(c) by contributing to infringement of at least claims 1-30 of the ’403 Patent, literally and/or under the doctrine of equivalents, by, among other things, selling, offering for sale, and/or importing within this judicial district and elsewhere in the United States, the Accused System and other similar systems with knowledge of the ’403 Patent and knowing that the Accused System and other similar systems are especially made or especially adapted for use in the infringement of the ’403 Patent, and is not a staple article or commodity of commerce suitable for substantial noninfringing use.

80. TankLogix’s infringement (both direct and indirect) of the ’403 Patent has been, and continues to be, with full knowledge of the ’403 Patent, since at least as early as the filing of this lawsuit, or as early as TankLogix employees have accessed the patent information on SitePro’s website.

81. For example, Claim 1 of the ’403 Patent recites:

> A system, comprising:
>
> a first computer system disposed at a first fluid handling site, the first fluid handling site comprising a first pump, a first valve, and a first tank that handle a first fluid, the first tank having a first fluid-level sensor with which the first computer system is configured to communicate to obtain a level of the first fluid in the first tank, and the first computer system being configured to provide remote control of the first pump or the first valve; and
>
> a server system remote from the fluid handling site, wherein the server system has memory storing instructions that, when executed, effectuate operations comprising:

receiving, with the server system, from the first computer, via a network, a first fluid level sensed by the fluid-level sensor;

obtaining, with the server system, credentials from a first client computing device;

determining, with the server system, based on the credentials, that a user of the first client computing device is authorized to interact with the first fluid handling site, wherein the server system hosts data about other fluid handling sites the user is not authorized to interact;

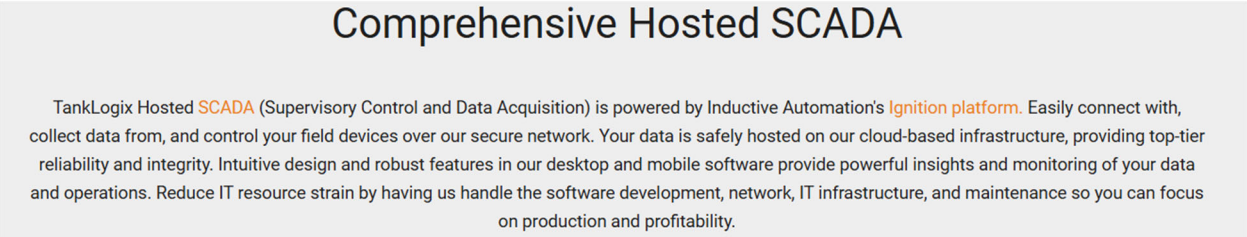
after the determination, providing, with the server system, via the network, information by which a first client computing device presents a user interface indicating the first fluid level, the first client computing device being remote from the server system and the first computer system;

receiving, with the server system, from the first client computing device, a first command to change a state of the first pump; and

causing, with the server system, the first computer system disposed at the first fluid handling site to effectuate the command by changing the state of the first pump to a sequence of different target states that change over time.

82. By way of example, the Accused System meets every element of Claim 1.

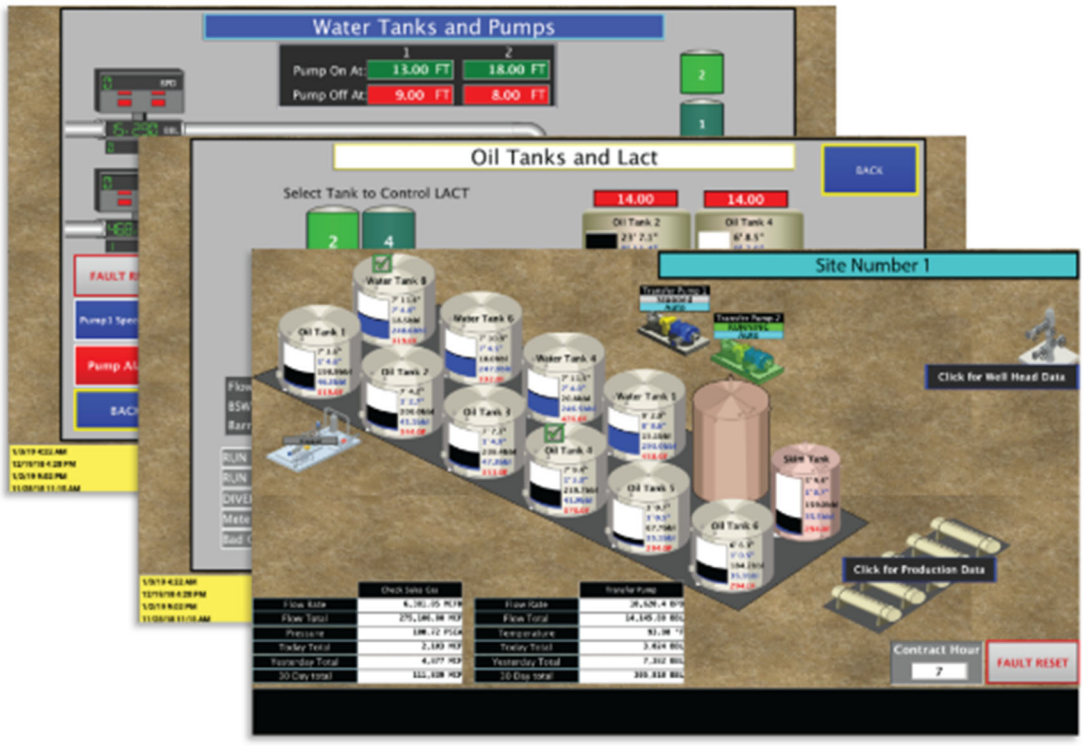
83. To the extent the preamble is found limiting, the Accused System is a system as claimed:

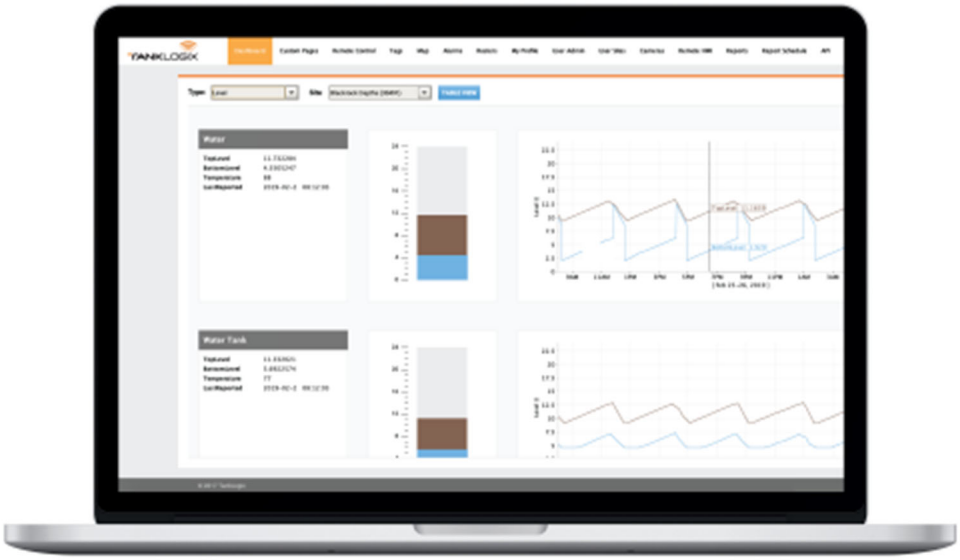


https://www.tanklogix.com/hosted-ignition/.

84. As shown in the examples below, the Accused System further comprises a first computer system disposed at a first fluid handling site, the first fluid handling site comprising a first pump, a first valve, and a first tank that handle a first fluid, the first tank having a first fluid-level sensor with which the first computer system is configured to communicate to obtain a level

of the first fluid in the first tank, and the first computer system being configured to provide remote control of the first pump or the first valve:





TANKLOGIX

Produced Wastewater

This excess water slows production because the tanks that are used to store the water become full. Therefore, no oil or gas can be produced because there is no place to store the water. The TankWarden System can help automate truck dispatching to ensure that the producer doesn't have to slow down production.

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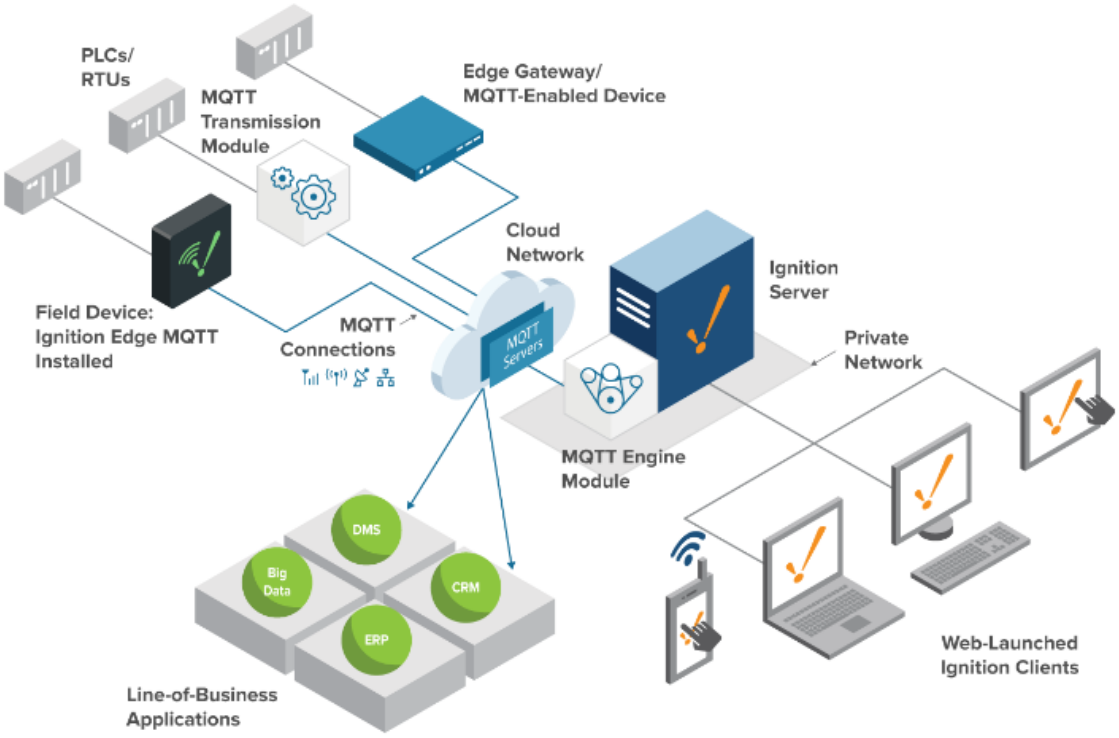
TankLogix has implemented the Tank Warden System at water disposal sites as well. These customers especially enjoy the automatic tank gauging system because they don't have to employ someone to permanently watch the tanks. TankLogix has also provided other automated tank monitoring and field monitoring services to water disposal companies. Some of the other devices TankLogix can monitor at the wellhead are:

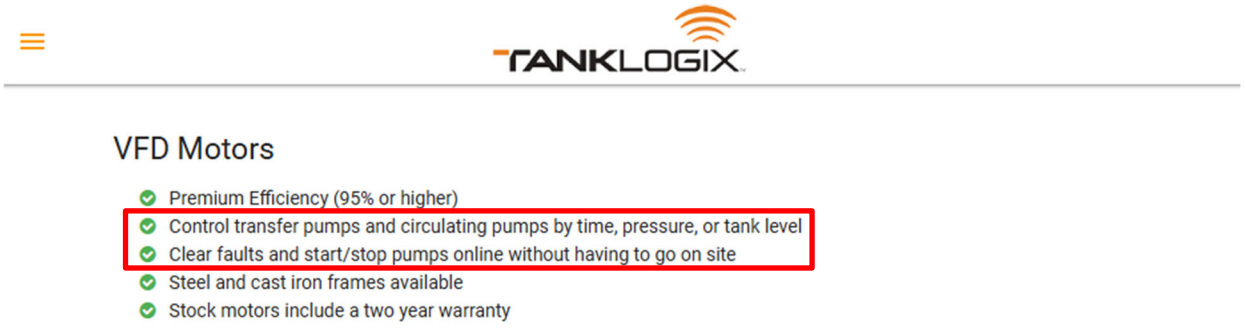
- Flow Meters
- Pumps
- H_2S and other gasses
- Premium Sensors

https://www.tanklogix.com/hosted-ignition/.

IIoT Architecture

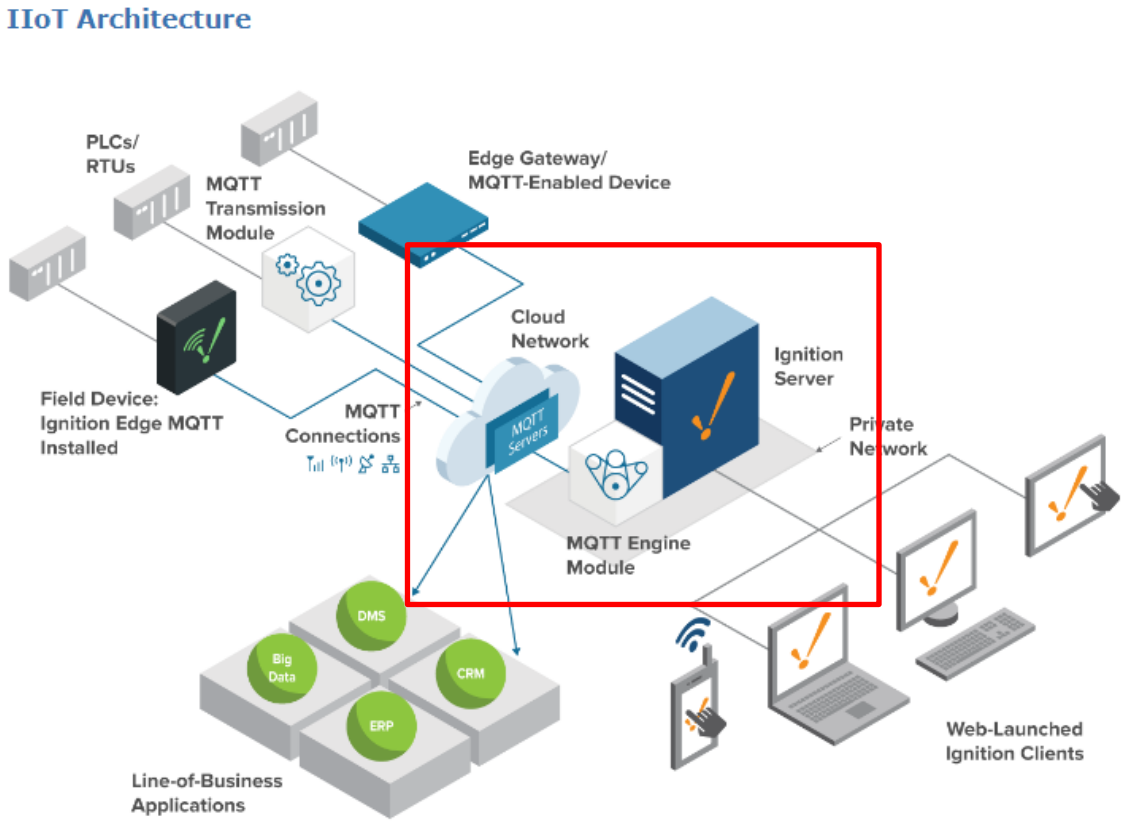


https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.



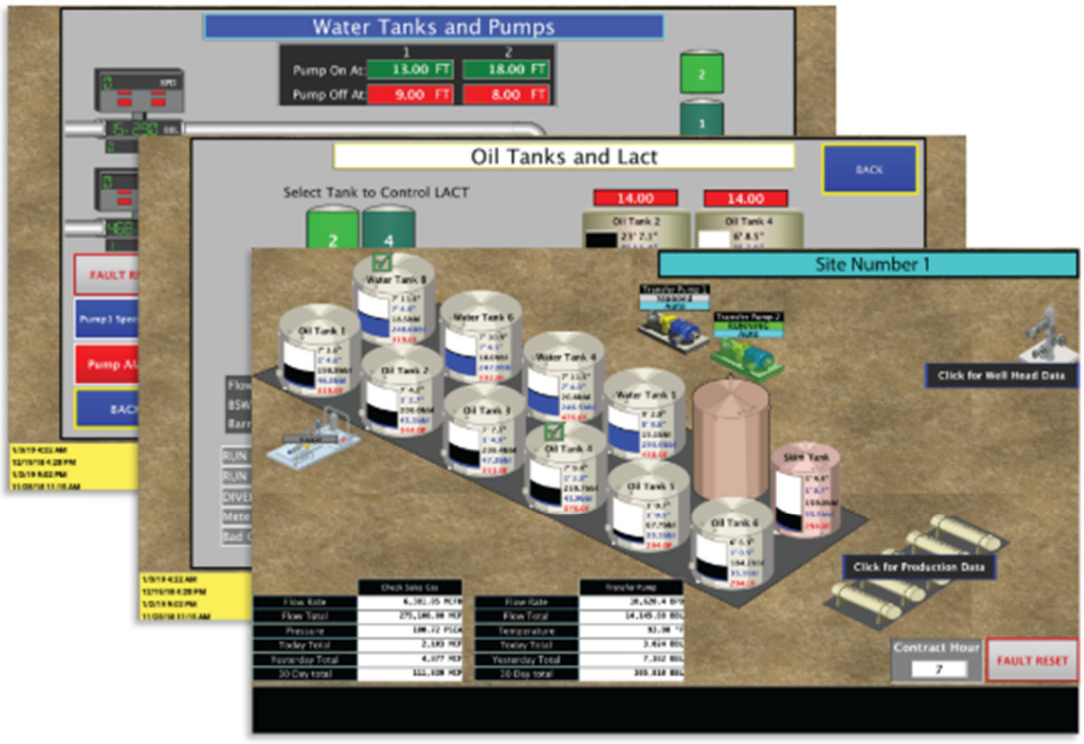
https://tanklogix.com/vfd-controls-and-motors/.

85. As shown in the examples below, the Accused System further comprises a server system remote from the fluid handling site, wherein the server system has memory storing instructions that, when executed, effectuate operations:

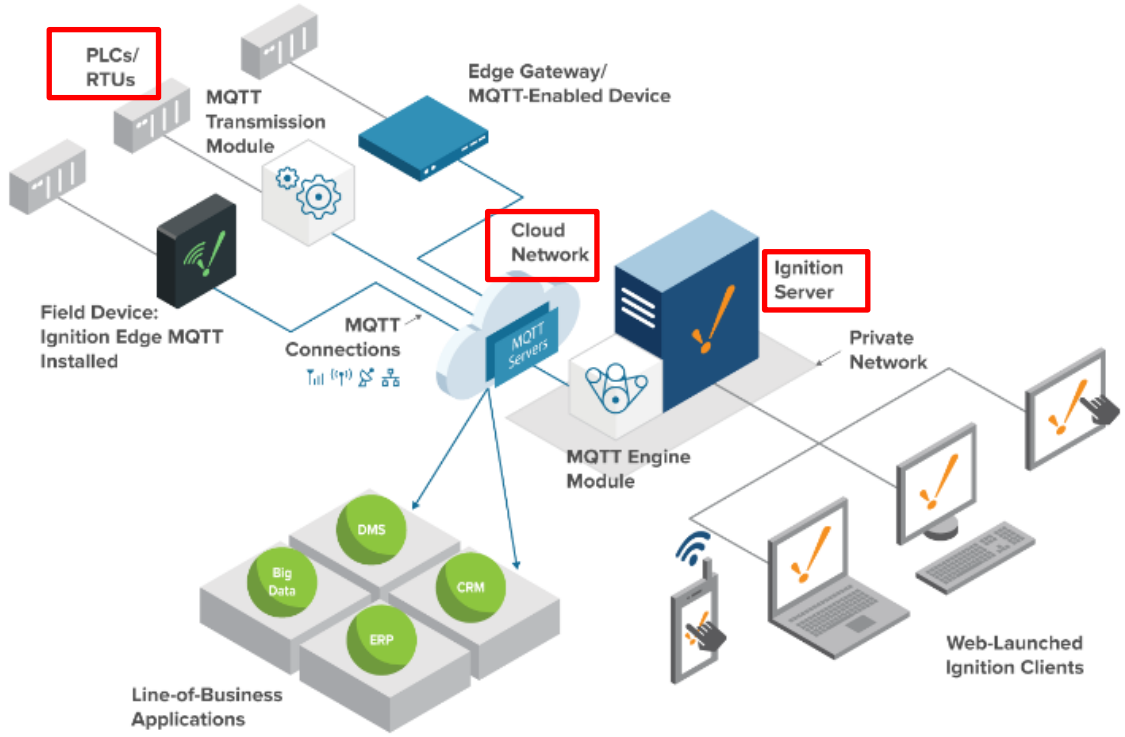


https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.

86. As shown in the examples below, the Accused System further comprises receiving, with the server system, from the first computer, via a network, a first fluid level sensed by the fluid-level sensor:

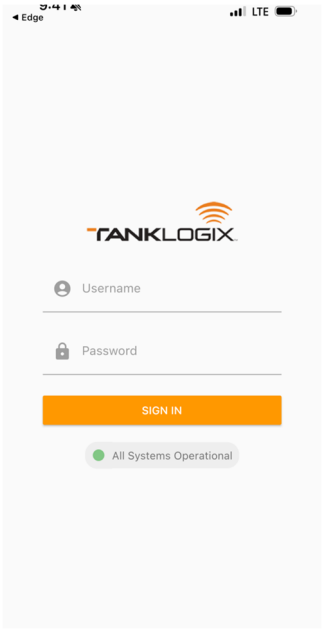


https://www.tanklogix.com/hosted-ignition/.

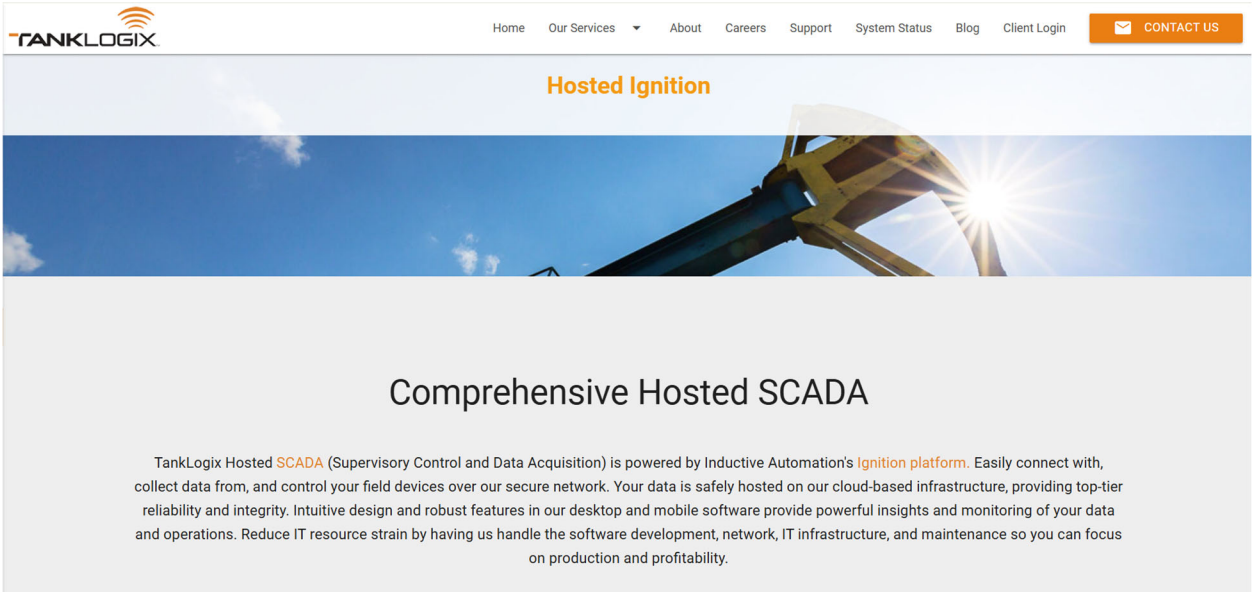


https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.

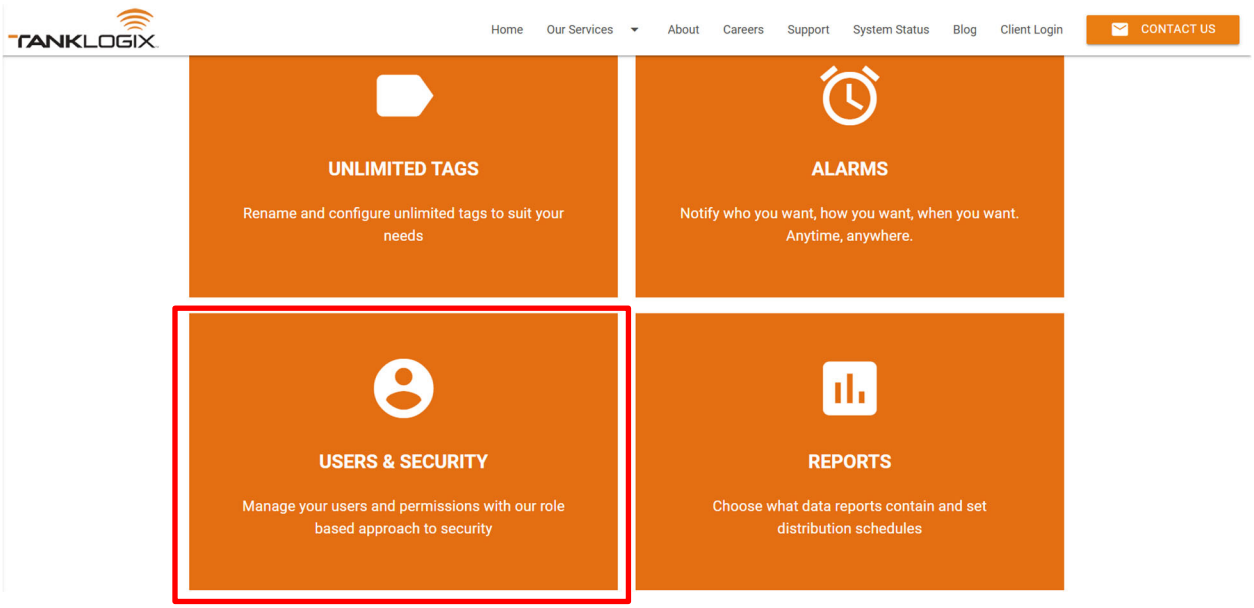
87. As shown in the example below from the TankLogix mobile application, the Accused System further comprises obtaining, with the server system, credentials from a first client computing device:



88. As shown in the examples below, the Accused System further comprises determining, with the server system, based on the credentials, that a user of the first client computing device is authorized to interact with the first fluid handling site, wherein the server system hosts data about other fluid handling sites the user is not authorized to interact:

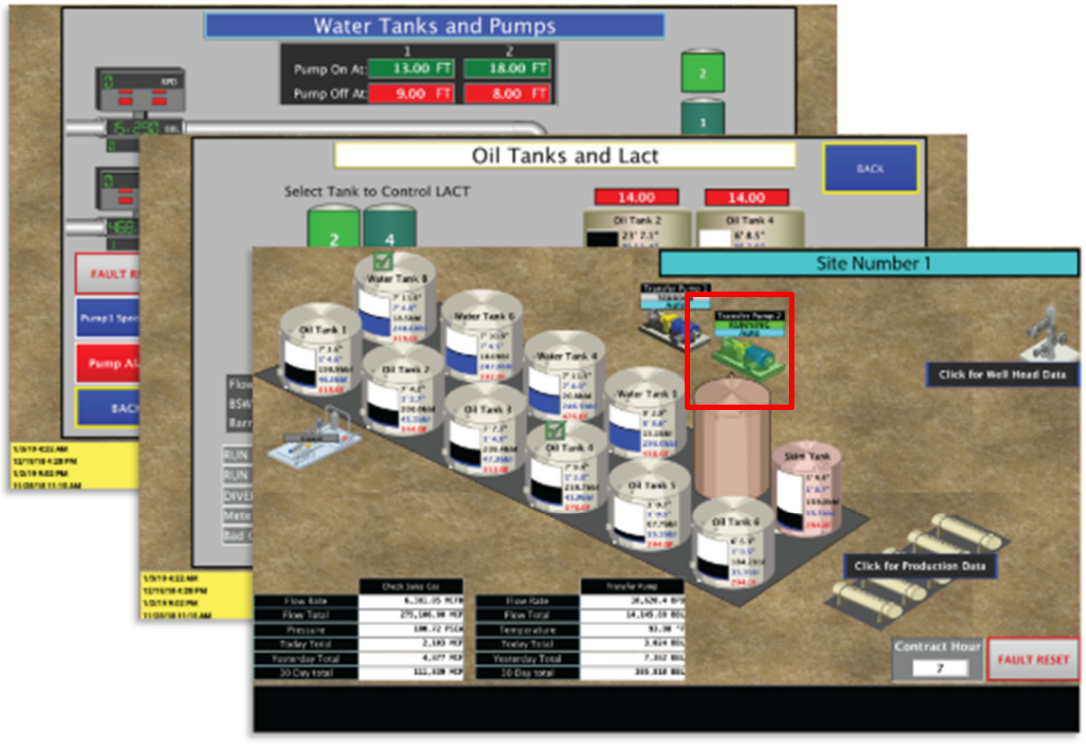


https://www.tanklogix.com/hosted-ignition/. On information and belief, the Accused System provides access to TankLogix customer organizations to monitor fluid handling sites.

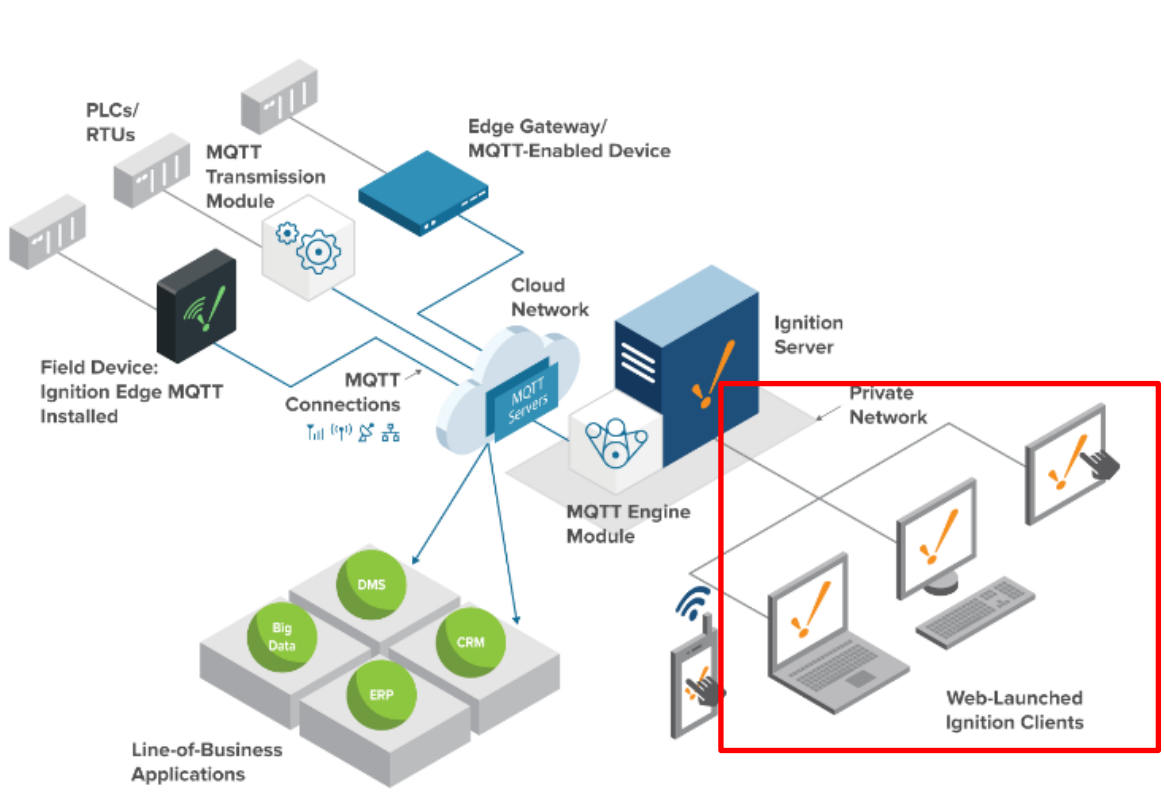


https://www.tanklogix.com/hosted-ignition/ (annotated).

89. As shown in the examples below, the Accused System further comprises after the determination, providing, with the server system, via the network, information by which a first client computing device presents a user interface indicating the first fluid level, the first client computing device being remote from the server system and the first computer system:

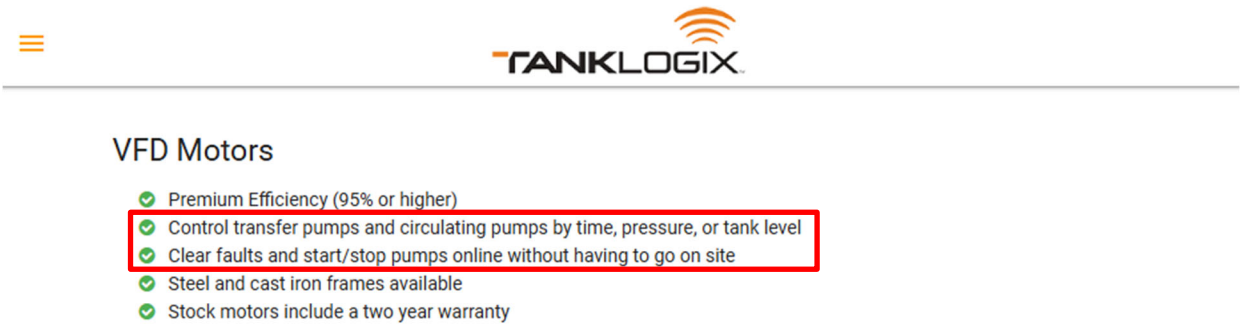


https://www.tanklogix.com/hosted-ignition/.



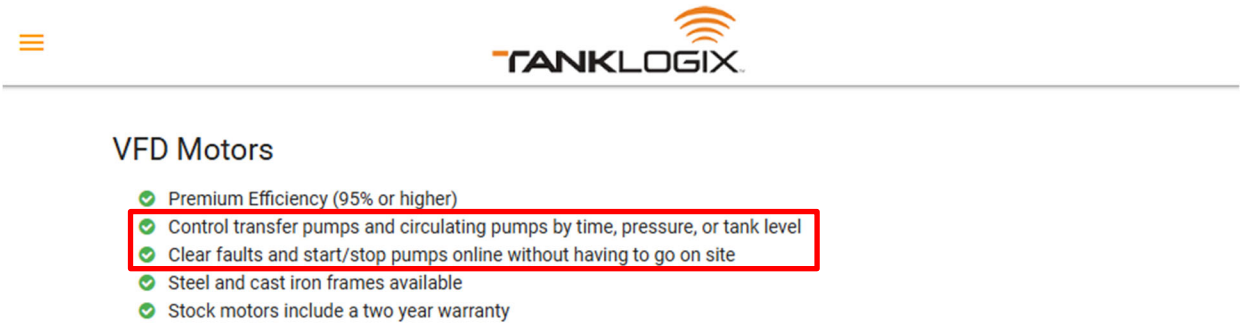
https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.

90. As shown in the examples below, the Accused System further comprises receiving, with the server system, from the first client computing device, a first command to change a state of the first pump:



https://tanklogix.com/vfd-controls-and-motors/.

91. As shown in the examples below, the Accused System further comprises causing, with the server system, the first computer system disposed at the first fluid handling site to effectuate the command by changing the state of the first pump to a sequence of different target states that change over time:



https://tanklogix.com/vfd-controls-and-motors/. On information and belief, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that change the state of the first pump to a sequence of target states over time to effectuate a command.

92. As a result of TankLogix's infringement of the '403 Patent, SitePro has been damaged and is entitled to recover from TankLogix the damages sustained by SitePro as a result of TankLogix's acts in an amount adequate to compensate SitePro for TankLogix's infringement, subject to proof at trial.

93. TankLogix's knowing, willful, and deliberate infringement of the claims of the '403 Patent is in conscious disregard of SitePro's rights, makes this case exceptional within the meaning of 35 U.S.C. § 285, and justifies treble damages pursuant to 35 U.S.C. § 284, as well as attorneys' fees pursuant to 35 U.S.C. § 285.

94. To the extent TankLogix continues to implement other systems that are similar to the Accused System, and/or utilize Ignition or similar platforms, such activities constitute continued willful infringement by TankLogix.

COUNT IV

TankLogix's Infringement of the U.S. Patent Nos. 12,019,461

95. SitePro repeats and realleges as if fully set forth herein, the allegations set forth in the foregoing paragraphs of this Complaint.

96. TankLogix directly infringed and continues to directly infringe, under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, at least claims 1-17 of the '461 Patent by manufacturing, using, selling, offering to sell, and/or importing into the United States the Accused System.

97. TankLogix has been and is indirectly infringing the '461 Patent by actively inducing or contributing to the direct infringement by others of the '461 Patent in the United States, the State of Texas, and this District.

98. TankLogix also has been and is now knowingly and intentionally inducing infringement of at least claims 1-17 of the ’461 Patent in violation of 35 U.S.C. § 271(b). TankLogix has had knowledge of the ’461 Patent and the infringing nature of the Accused System and other similar systems since at least the filing and service of this Complaint.

99. TankLogix specifically intended and was aware that the ordinary and customary use of the Accused System and other similar systems would infringe the ’461 Patent.

100. TankLogix further took active steps to encourage end users to use and operate the Accused System and other similar systems, despite knowing of the ’461 Patent, in a manner they knew to directly infringe at least claims 1-17 of the ’461 Patent. Further, TankLogix provided product manuals and other technical information that cause their subscribers, customers, and other third parties to use and to operate the Accused System and other systems for their ordinary and customary use, such that TankLogix’s customers and other third parties have directly infringed the ’461 Patent, through the normal and customary use of the Accused System and other similar systems.

101. TankLogix also has been and are now in violation of 35 U.S.C. § 271(c) by contributing to infringement of at least claims 1-17 of the ’461 Patent, literally and/or under the doctrine of equivalents, by, among other things, selling, offering for sale, and/or importing within this judicial district and elsewhere in the United States, the Accused System and other similar systems with knowledge of the ’461 Patent and knowing that the Accused System and other similar systems are especially made or especially adapted for use in the infringement of the ’461 Patent, and is not a staple article or commodity of commerce suitable for substantial noninfringing use.

102. TankLogix’s infringement (both direct and indirect) of the ’461 Patent has been, and continues to be, with full knowledge of the ’461 Patent, since at least as early as the filing of

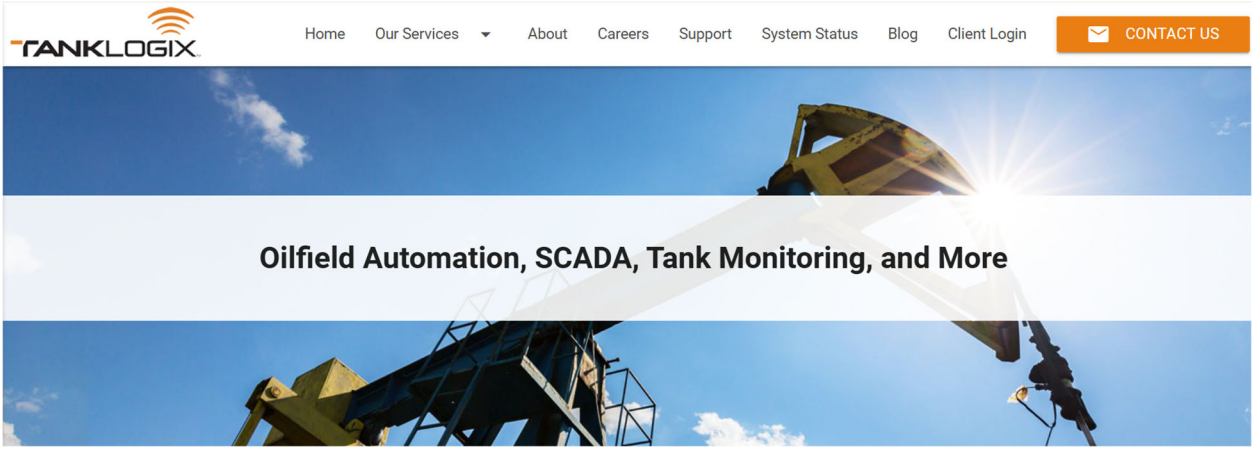
this lawsuit, or as early as TankLogix employees have accessed the patent information on SitePro's website.

103. For example, Claim 1 of the '461 Patent recites:

> A fluid processing method, comprising:
>
> receiving, with a first computer system disposed at a first fluid-handling site, information comprising one or more properties of a first fluid from one or more sensors disposed at a first fluid tank itself disposed at the first fluid-handling site, the fluid-handling site comprising one or more fluid-handling devices, the one or more fluid-handling devices comprising one or more of a first pump, a first filter, and a first valve;
>
> providing, with the first computer system disposed at a first fluid handling site, remote control of a first fluid-handling device of the one or more fluid-handling devices;
>
> receiving, with a server system, from the first computer system, via a network, a first fluid property of the one or more properties associated with the first fluid sensed by a first sensor of the one or more sensors;
>
> obtaining, with the server system, credentials from a first client computing device;
>
> determining, with the server system, based on the credentials, that a user of the first client computing device is authorized to interact with the first fluid handling site, wherein the server system hosts data about other fluid handling sites the user is not authorized to interact;
>
> after the determination, providing, with the server system, via the network, information by which the first client computing device presents a user interface indicating the first fluid property, the first client computing device being remote from the server system and the first computer system;
>
> receiving, with the server system, from the first client computing device, a first command to change a state of the first fluid-handling device; and
>
> causing, with the server system, the first computer system disposed at the first fluid handling site to effectuate the command by changing the state of the first fluid-handling device to a sequence of different target states that change over time.

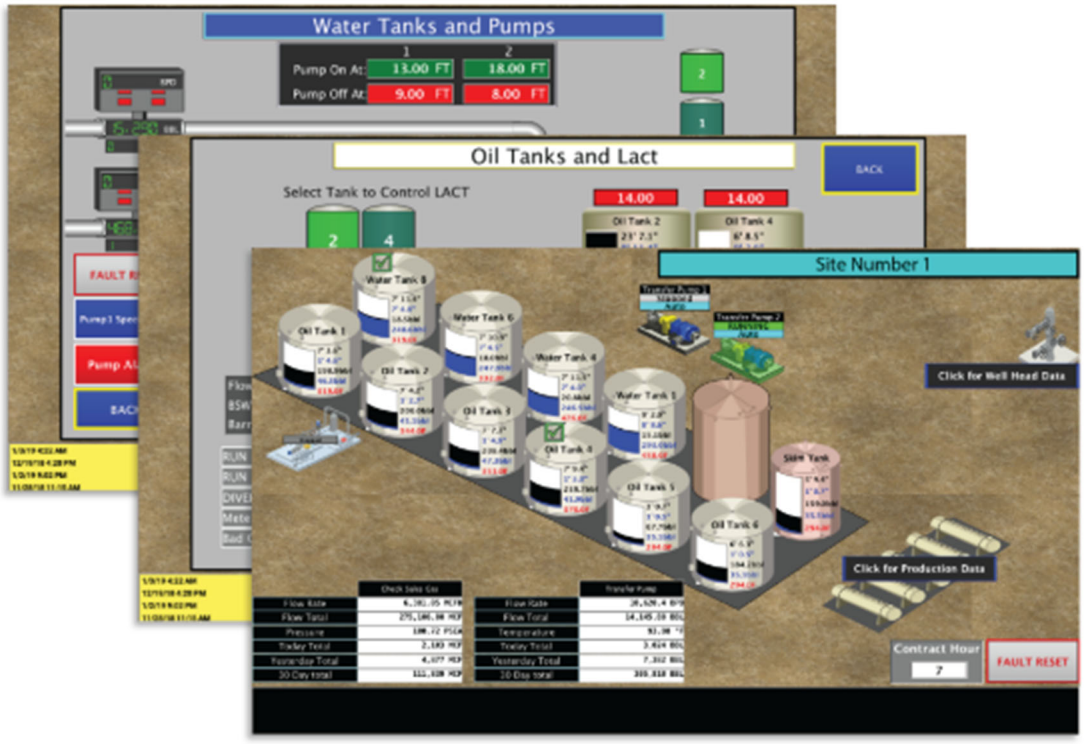
104. By way of example, the Accused System meets every element of Claim 1.

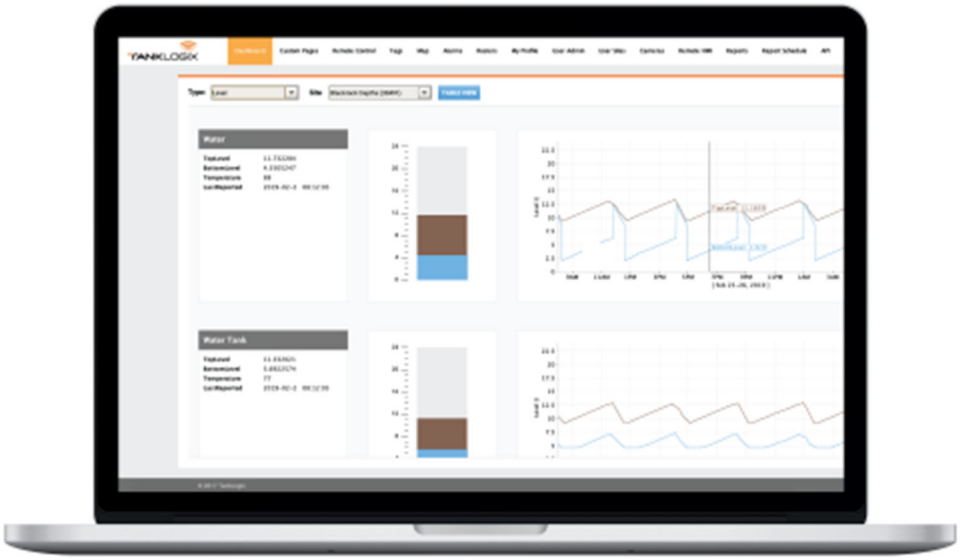
105. To the extent the preamble is found limiting, the Accused System performs a fluid processing method as claimed:



https://www.tanklogix.com/.

106. As shown in the example below, the Accused System further comprises receiving, with a first computer system disposed at a first fluid-handling site, information comprising one or more properties of a first fluid from one or more sensors disposed at a first fluid tank itself disposed at the first fluid-handling site, the fluid-handling site comprising one or more fluid-handling devices, the one or more fluid-handling devices comprising one or more of a first pump, a first filter, and a first valve:


Water Tanks and Pumps
Pump On At:
13.00 FT
18.00 FT
Pump Off At:
9.00 FT
8.00 FT
Oil Tanks and Lact
Select Tank to Control LACT
BACK
14.00
14.00
Site Number 1
Click for Well Head Data
Click for Production Data
Contract Hour
FAULT RESET



TANKLOGIX

Produced Wastewater

This excess water slows production because the tanks that are used to store the water become full. Therefore, no oil or gas can be produced because there is no place to store the water. The TankWarden System can help automate truck dispatching to ensure that the producer doesn't have to slow down production.

TankLogix recognizes that trucking this water is expensive, which is why minimizing trucking expenses can greatly increase the bottom line. The Tank Warden System enhances transparency and accountability for both operators and transporters. The Tank Warden System can be configured to restrict access to the valve if the driver of the truck is not verified; it can also report instantly the amount of water/product that has been taken. This system has successfully enhanced tank security, while reducing theft and human error.

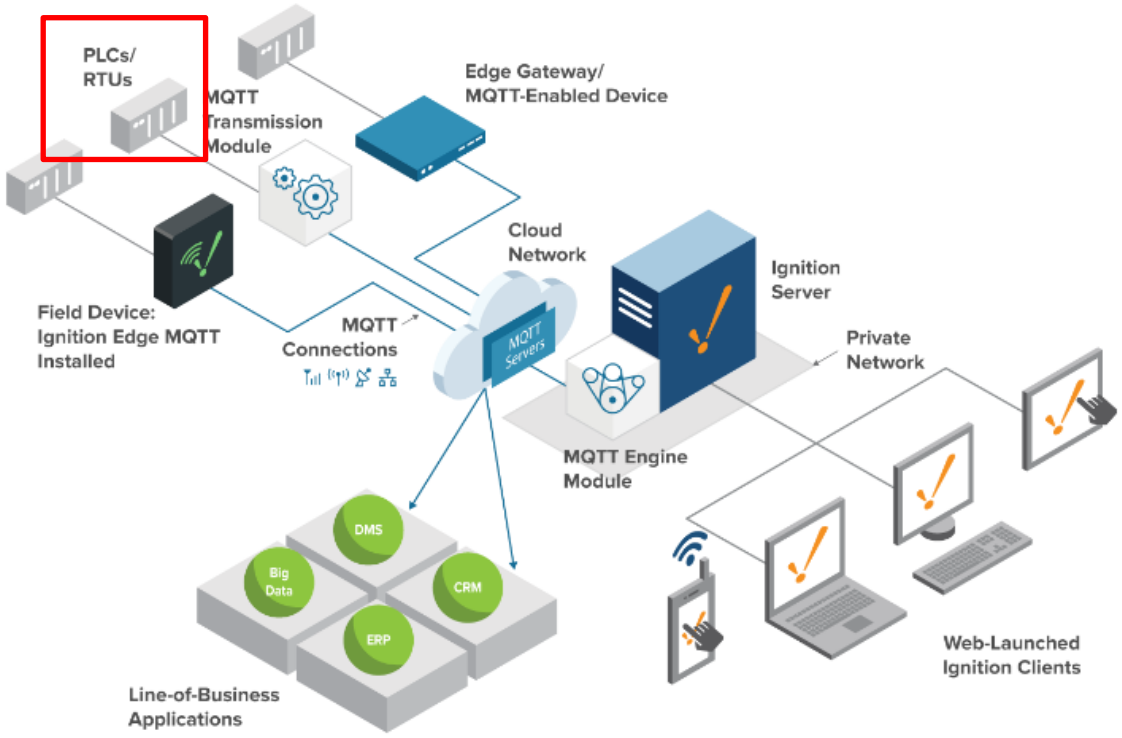
TankLogix has implemented the Tank Warden System at water disposal sites as well. These customers especially enjoy the automatic tank gauging system because they don't have to employ someone to permanently watch the tanks. TankLogix has also provided other automated tank monitoring and field monitoring services to water disposal companies. Some of the other devices TankLogix can monitor at the wellhead are:

- Flow Meters
- Pumps
- H_2S and other gasses
- Premium Sensors

https://www.tanklogix.com/hosted-ignition/.

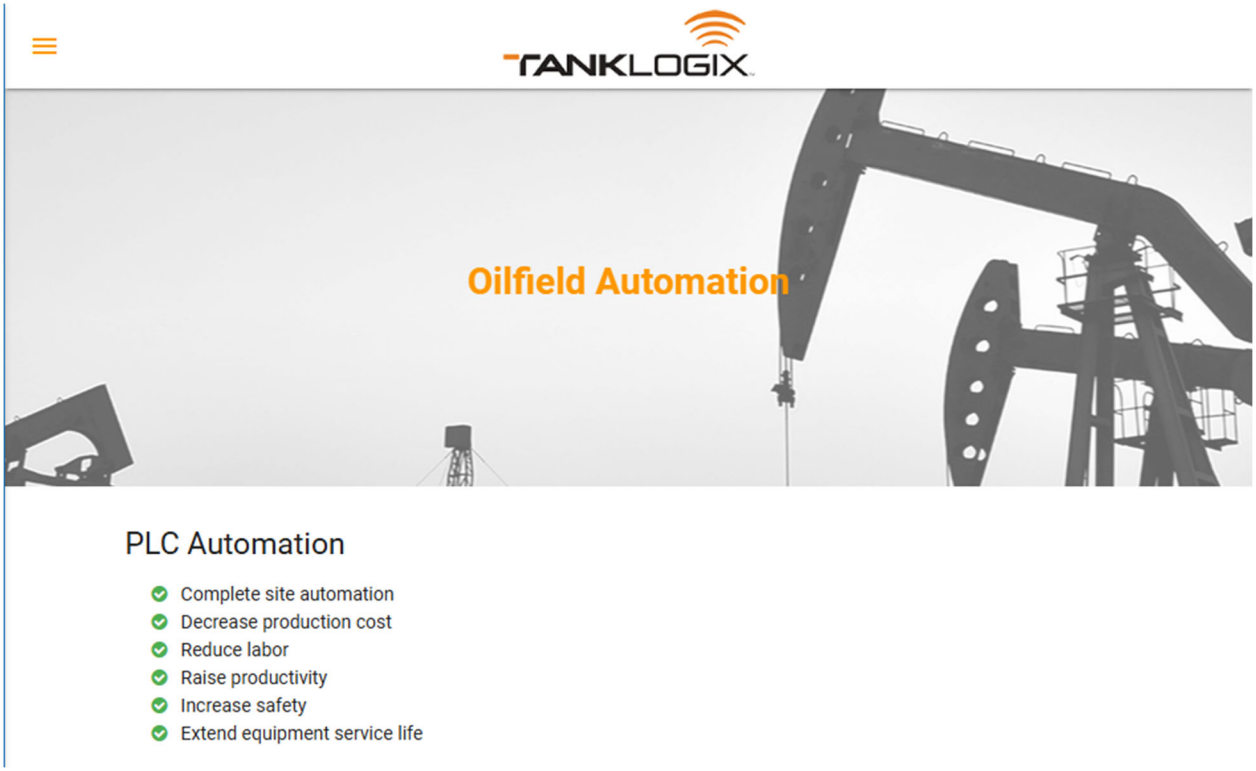
IIoT Architecture

First computer system disposed at a first fluid-handling site



https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.

107. As shown in the example below, the Accused System further comprises providing, with the first computer system disposed at a first fluid handling site, remote control of a first fluid-handling device of the one or more fluid-handling devices:

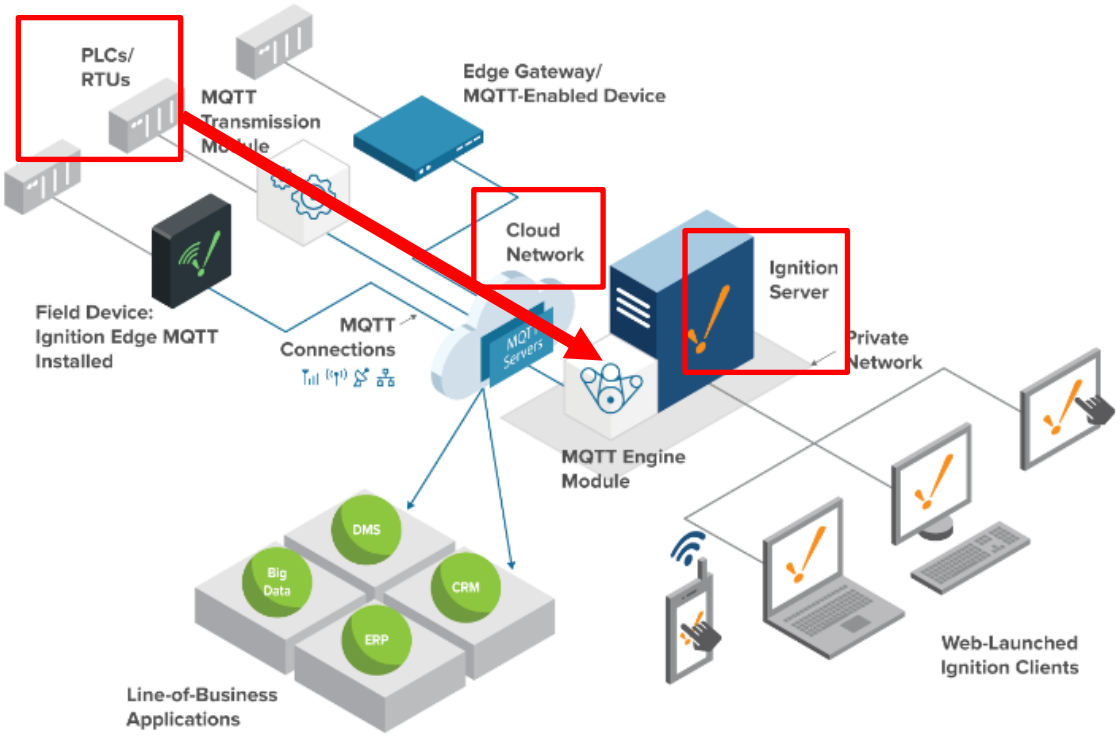


https://tanklogix.com/oilfield-automation/.

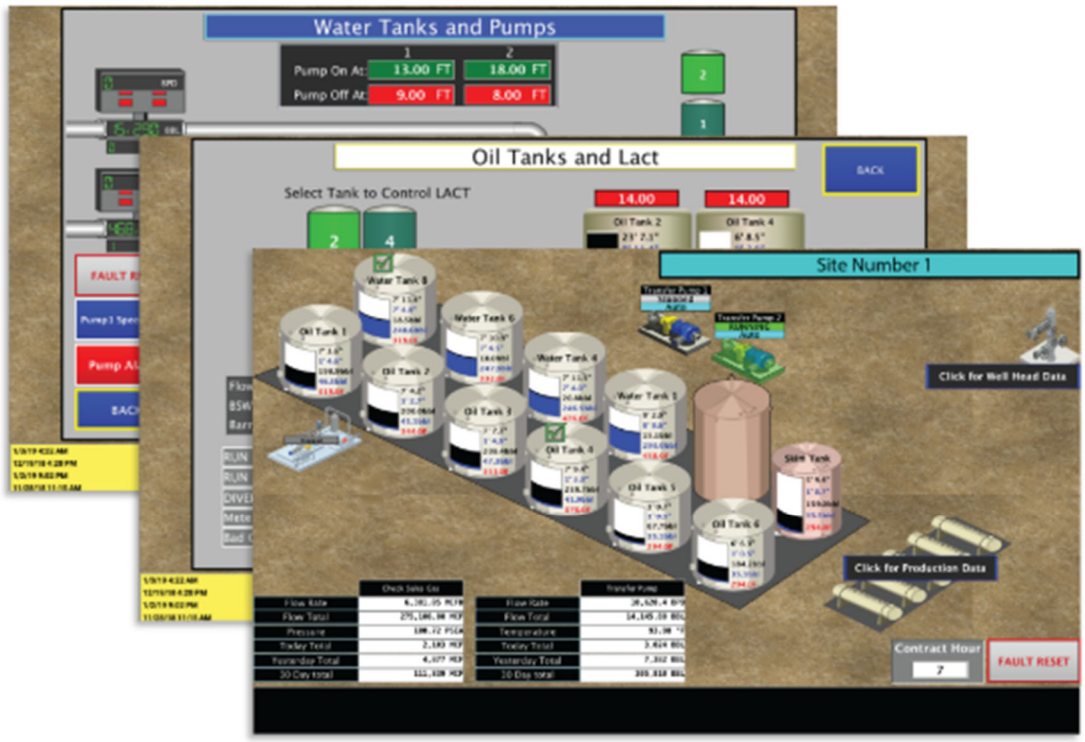
108. As shown in the example below, the Accused System further comprises receiving, with a server system, from the first computer system, via a network, a first fluid property of the one or more properties associated with the first fluid sensed by a first sensor of the one or more sensors:

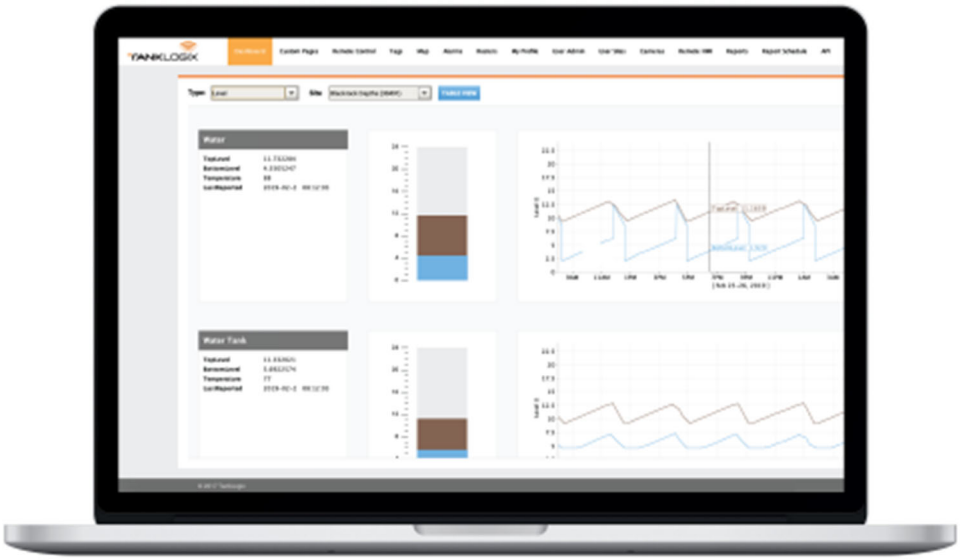
IIoT Architecture

First computer system



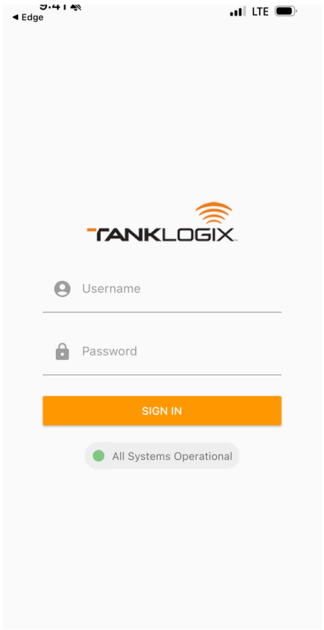
https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.





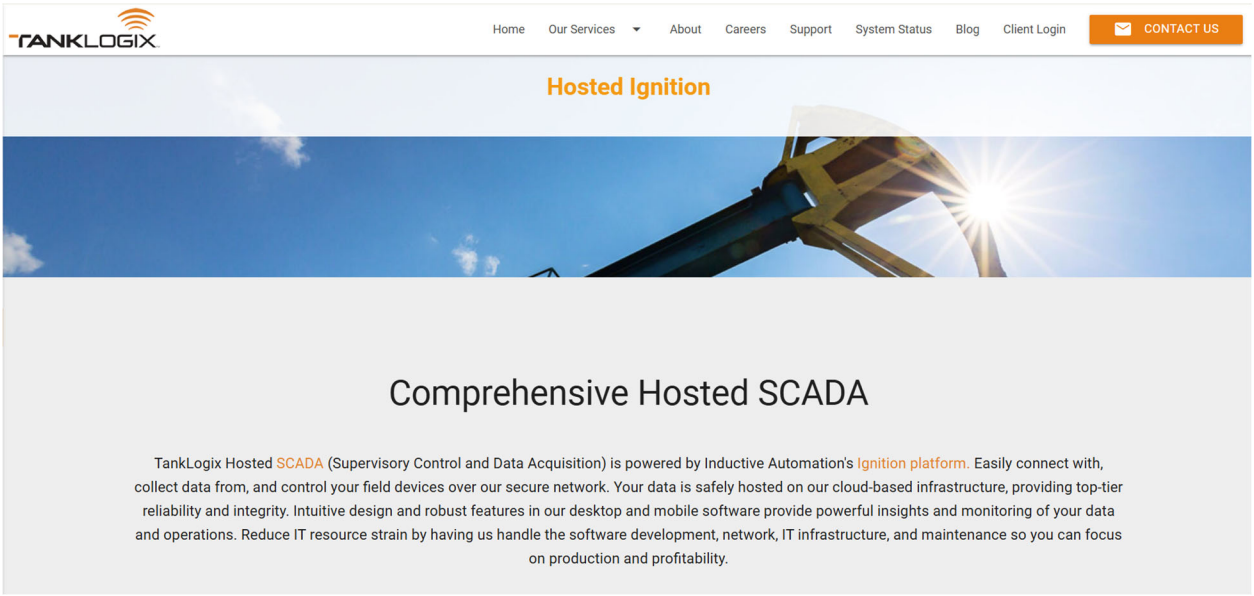
https://www.tanklogix.com/hosted-ignition/.

109. As shown in the example below from the TankLogix mobile application, the Accused System further comprises obtaining, with the server system, credentials from a first client computing device:

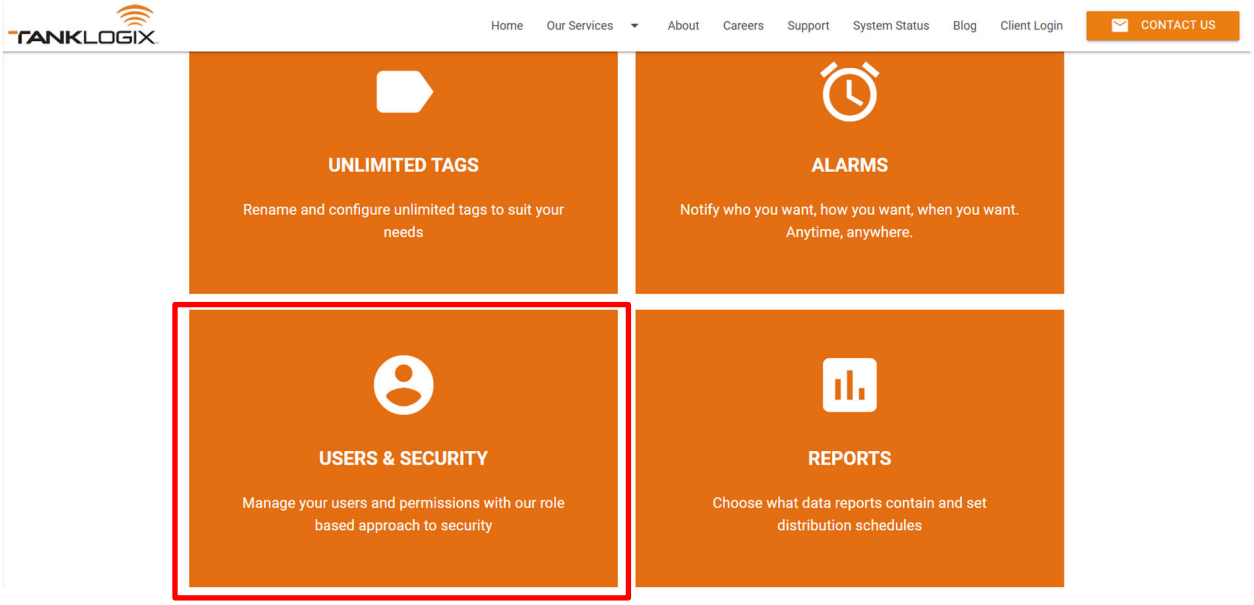


110. As shown in the example below, the Accused System further comprises determining, with the server system, based on the credentials, that a user of the first client

computing device is authorized to interact with the first fluid handling site, wherein the server system hosts data about other fluid handling sites the user is not authorized to interact:

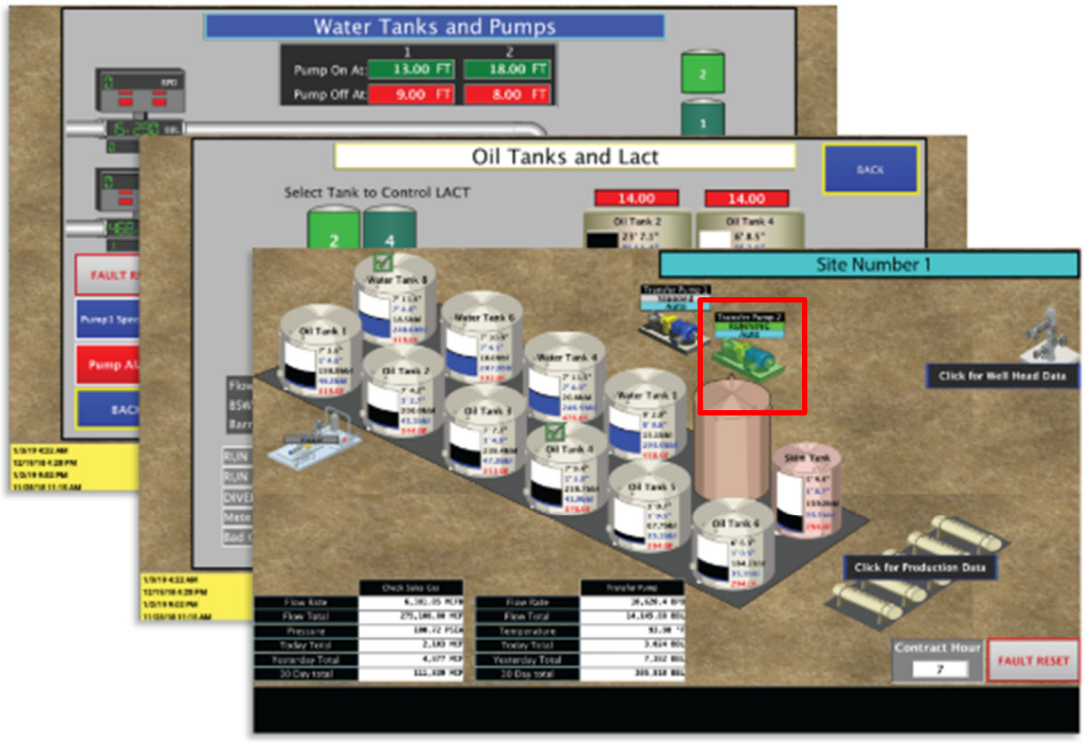


https://www.tanklogix.com/hosted-ignition/. On information and belief, the Accused System provides access to multiple TankLogix customer organizations to monitor fluid handling sites.

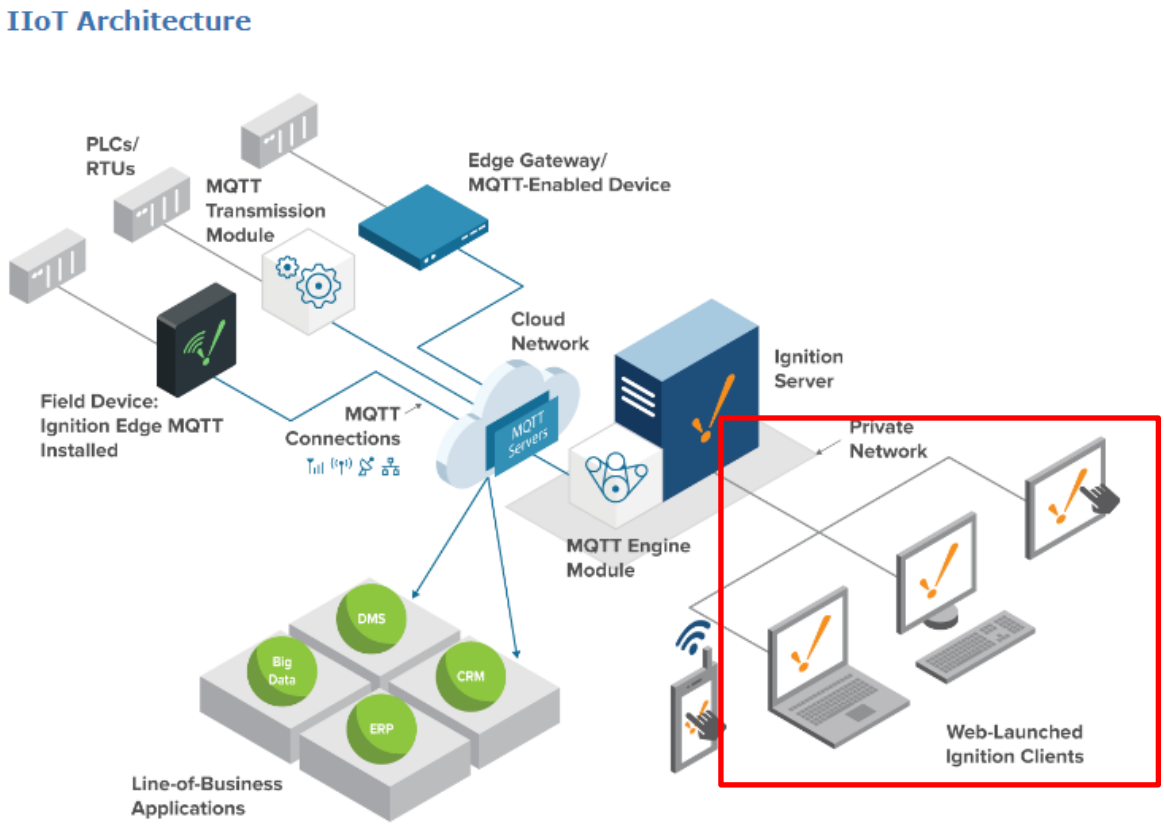


https://www.tanklogix.com/hosted-ignition/ (annotated). The Accused System necessarily hosts data about other customer organizations' fluid handling sites with which a user from the first organization is not authorized to interact.

111. As shown in the example below, the Accused System further comprises after the determination, providing, with the server system, via the network, information by which the first client computing device presents a user interface indicating the first fluid property, the first client computing device being remote from the server system and the first computer system:

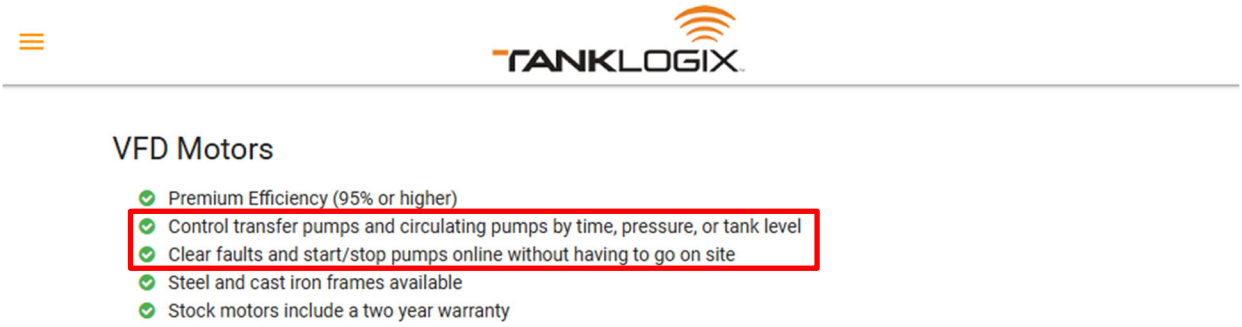


https://www.tanklogix.com/hosted-ignition/.

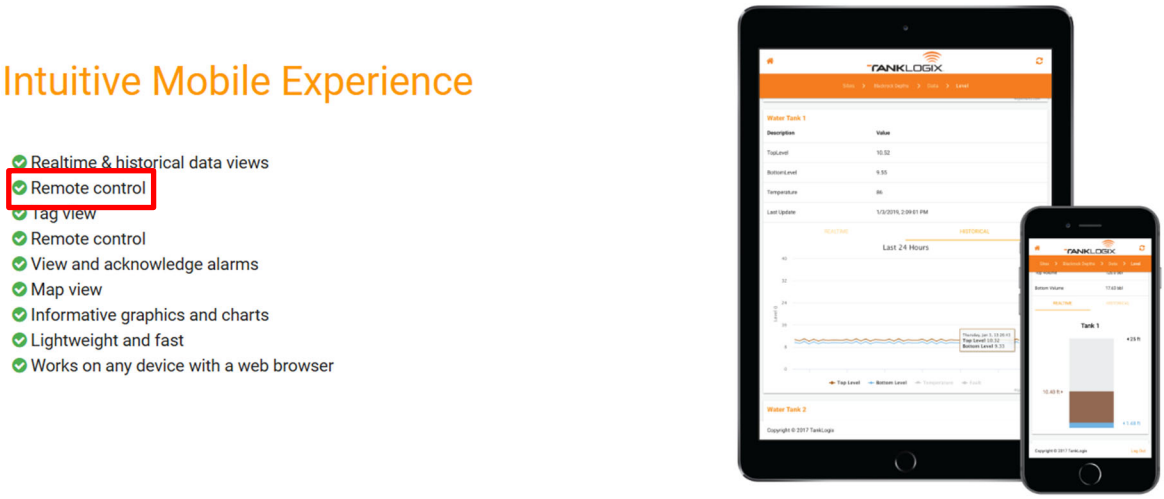


https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.

112. As shown in the example below, the Accused System further comprises receiving, with the server system, from the first client computing device, a first command to change a state of the first fluid-handling device:

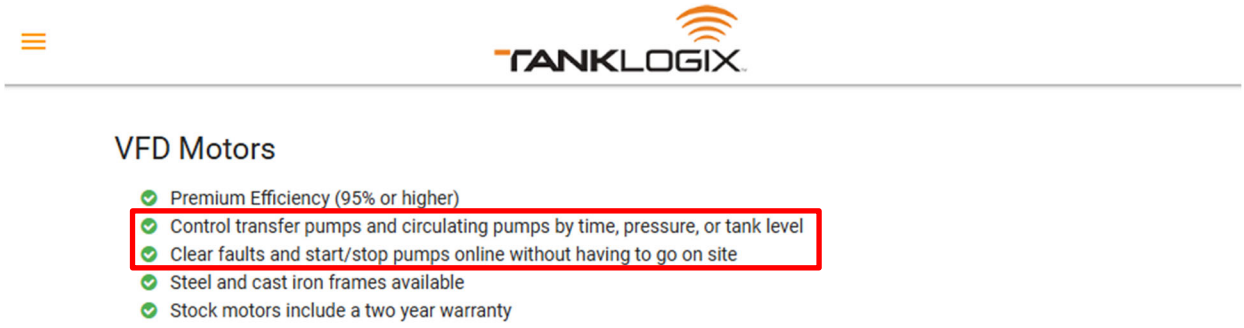


https://tanklogix.com/vfd-controls-and-motors/.



https://tanklogix.com/hosted-ignition/.

113. As shown in the example below, the Accused System further comprises causing, with the server system, the first computer system disposed at the first fluid handling site to effectuate the command by changing the state of the first fluid-handling device to a sequence of different target states that change over time:



https://tanklogix.com/vfd-controls-and-motors/. On information and belief, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that change the state of the first pump to a sequence of target states over time to effectuate a command.

114. As a result of TankLogix's infringement of the '461 Patent, SitePro has been damaged and is entitled to recover from TankLogix the damages sustained by SitePro as a result

of TankLogix's acts in an amount adequate to compensate SitePro for TankLogix's infringement, subject to proof at trial.

115. TankLogix's knowing, willful, and deliberate infringement of the claims of the '461 Patent is in conscious disregard of SitePro's rights, makes this case exceptional within the meaning of 35 U.S.C. § 285, and justifies treble damages pursuant to 35 U.S.C. § 284, as well as attorneys' fees pursuant to 35 U.S.C. § 285.

116. To the extent TankLogix continues to implement other systems that are similar to the Accused System, and/or utilize Ignition or similar platforms, such activities constitute continued willful infringement by TankLogix.

PERMANENT INJUNCTION

117. SitePro repeats and realleges, as is fully set forth herein, the allegations set forth in the foregoing paragraphs of this Complaint.

118. SitePro seeks a permanent injunction incorporating the relief sought above on a preliminary basis, and further:

(a) Barring Defendant TankLogix from competing with SitePro;

(b) Providing for all additional restrictions necessary to protect SitePro from the harm likely to result from Defendant TankLogix's continued infringing conduct.

119. Permanent injunctive relief against TankLogix is appropriate because, as SitePro will demonstrate through separate motion and briefing:

(a) Defendant TankLogix's conduct has caused and will continue to cause irreparable injury to SitePro;

(b) Monetary damages will be inadequate to remedy the injury;

(c) An injunction is warranted considering the balance of hardships between the parties; and

(d) Issuing the injunction would not disserve the public interest.

Abraham v. Alpha Chi Omega, 708 F.3d 614, 627 (5th Cir. 2013) (citing *eBay, Inc. v. MercExchange, L.L.C.*, 547 U.S. 388, 391 (2006)).

JURY DEMAND

120. SitePro demands a jury trial on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, SitePro requests the Court enter judgment in SitePro's favor and against TankLogix as follows:

(a) That TankLogix has directly infringed, either literally or under the doctrine of equivalents, the Asserted Patents in violation of 35 U.S.C. § 271(a);

(b) That TankLogix has induced and/or contributed to infringement and/or is inducing and/or contributing to infringement of the Asserted Patents, either literally or under the doctrine of equivalents;

(c) Awarding SitePro its damages suffered as a result of TankLogix's infringement, including, but not limited to, a reasonable royalty pursuant to 35 U.S.C. § 284, SitePro's actual damages, enhanced damages, exemplary damages, costs, prejudgment and post judgment interest to be proven at trial;

(d) Awarding SitePro costs and expenses pursuant to 35 U.S.C. § 284 or as otherwise permitted by law;

(e) Ordering a permanent injunction against all present and future infringing acts by TankLogix or, in the alternative, an award of an ongoing royalty;

(f) Finding that TankLogix's infringement has been willful at least as of the date of this Complaint, and awarding SitePro appropriate enhances damages pursuant to 35 U.S.C. § 284;

(g) Finding this case to be exceptional within the meaning of 35 U.S.C. § 285;

(h) Awarding SitePro its costs, attorneys' fees, expenses, and interest;

(i) Granting SitePro such other and further relief as the Court deems just and equitable.

Dated: December 20, 2024

Respectfully submitted,

/s/*M. Craig Tyler*

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